

United States

Environmental Protection Agency

Washington, DC 20460

Formulator's Exemption Statement

(40 CFR 152.85)

Applicant's Name and Address

Prime Source LLC

c/o Wagner Regulatory Associates, Inc.

P.O. Box 640

Hockessin, DE 19707

EPA File Symbol/Registration Number 89442-23

Product Name
Bifen 7.9SC Select

Date of Confidential Statement of Formula (EPA Form 8570-4)

11/06/2020

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Bifenthrin

- (2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).
- (3) Indicate by checking (A) or (B) below which paragraph applies:
- (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

- (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.
- (4) The following active ingredients in this product qualify for the formulator's exemption.

	Source	
Active Ingredient	Product Name	Registration Number
Bifenthrin		
Signature	Name and Title	Date
	Ogongi Ogongi, Agent	11/06/2020

EPA Form 8570-27 (Rev. 06-2004)

Copy 1 – EPA Copy 2 - Applicant copy

Please read instructions on	United State Environmental Protections Washington DC			Form Approve	Registra Amendr	tion	O. Approvel expires 2-28- OPP Identifier Number
	Wash	nington, DC 204			Other		
		Application	on for Pesticide	- Section	di-		
1. Company/Product Numb 89442-23	er			oduct Manager /n Herrick		3. Pr	oposed Classification
4. Company/Product (Name Bifen 7.9SC Select)		PM# 3				
5. Name and Address of Apprime Source, a diving 1525 NE 36th Street Ankeny, IA 50021	sion of Albaugh L		(b)(i), my to:	product is sing. No.	milar or ident	ical in co	FIFRA Section 3(c)(3) imposition and labeling
			Section - II				
Amendment - Explain Resubmission in res Notification - Explain	ponse to Agency lette	or dated		inal printed lab gency letter da Me Too" Appli Other - Explain b	ated cation.	e to	
e de la compania del compania del compania de la compania del la compania de la compania della c			Section - III				
1. Material This Product W	ill Be Packaged In:		-				
Child-Resistant Packaging Yes No	Unit Packaging Yes ✓ No		Water Soluble Pac Yes ✓ No	kaging	2. Type of	Metal Plastic Glass	
* Certification must be submitted	If "Yes" Unit Packaging wg	No. per t. container	If "Yes" Package wgt	No. per container		Paper	Specify)
3. Location of Net Contents	s Information	4. Size(s) Re	tail Container	5. L	ocation of Lab		
✓ Label 6. Manner in Which Label is	Container s Affixed to Product	Lithog Paper Steno	1 gal, 2.5 gal	Other _	Attached	to conta	iner
	-	Stenc	Section - IV				
1. Contact Point (Complete	e items directly below	for identification		ontacted, if ne	cessary, to pr	ocess this	application.)
Name Carolyn Miter			Title Registrations Spec			Telephon	e No. (Include Area Code) 4914 (cell)
	ements I have made o ny knowlinglly false o a law.		all attachments there				6. Date Application Received (Stamped)
2. Signature			3. Title Registrations Special	ist	229-444-4	1914	
4. Typed Name Carolyn Miter c	arolynm@albaughllc		5. Date Febru	2			
PA Form 8570-1 (Rev. 3-9	4) Previous editions a	re obsolete.		White -	EPA File Copy	(original)	Yellow - Applicant Co



February 22, 2021

Attn: Jacquelyn Herrick (PM 3)
Document Processing Desk (AMEND)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

Re: Albaugh LLC (089442)

Label Amendment: EPA Reg. No. 89442-23 – Bifen 7.9SC Select

Dear Ms. Herrick

Prime Source, a division of Albaugh LLC is submitting the enclosed application for label amendment for Bifen 7.9SC Select.

Prime Source is submitting this label amendment for the purpose of updating the label as required in the Interim Registration Review Decision for Bifenthrin as shown in tracked changes markings throughout the enclosed master label.

(File name: 089442-00023.20210222.DRAFT).

Please do not hesitate to contact me directly with any questions (919-740-9895).

Regards,

Nathan P. Ehresman Regulatory Director, NA

Albaugh, LLC

ase read instructions on reverse bei	fore completing form.		Form Approve	d, OMB No. 20	70-0060, Approval expires 05-31-9
	United States		☐ Registi	ration	OPP Identifier Number
EPA En	vironmental Protec	tion Agency	 ✓ Amend	ment	
	Washington, DC 2	20460	☐ Other:		
	Applica	tion for Pes	sticide – Section	n I	
1. Company/Product Number		2. EPA	Product Manager		3. Proposed Classification
89442-023			Jacquelyn H	errick	
4. Company/Product (Name)		PM#			None Restricted
Bifen 7.9SC Select			03		
5. Name and Address of Applican					with FIFRA Section
rime Source, a Division o	of Albaugh LLC			is similar or	identical in composition
/o Albaugh LLC O Box 2127			peling to:		
/aldosta, GA 31604-2127		EPA R	eg. No		
		Produc	ct Name:		
Check if this is a new	v address				
		Sectio			
Amendment – Explain belo			= '	•	Agency letter dated
Resubmission in response to Agency letter dated			"Me Too" Applicati		
Notification - Explain below. Explanation : Use addition	<u> </u>	Other - Explain be			
		Section	n – III		
Material This Product Will Be					
Child-Resistant Packaging Yes*	Unit Packaging Yes		Water Soluble Pack	kaging	2. Type of Container Metal
No No	No No		No No		Plastic
Z NO	If "Yes"	No. per	If "Yes"	No. per	Glass
*Certification must	Unit Packaging wgt.		Package wgt.	container	Paper
be submitted					Other (Specify)
Location of Net Contents Info	rmation 4. Size(s) Retail Contain	ner	5. Location	n of Label Directions
Label	Container 1 2	5 30 220 2	250, 266 gallon	On La	
6. Manner in Which Label is Affi		ithograph	Other	On lat	peling accompanying product
O. Manner III Which Laber is Alli	<u> </u>	Paper glued			
		Stenciled	- IV		
Contact Point (Complete items	e directly below for identifi	Section of individu		acassan, to am	ocass this application)
Name		Title	iai io be contacteu, il Ile		ephone No. (Include Area Code)
Kerly Pastor		Regulatory M	anager	10.0	229-221-8752
Loortify that the statements ! b ==	Certific		horoto are true accum-	o and asmulate	6. Date Application Received
I certify that the statements I hav acknowledge that any knowingly under applicable law.					• •
2. Signature Kerly	Pastor	3. Title Regulatory I	Manager		
4. Typed Name U		4. Date			
Kerly Pastor		May 18, 20)21		

kerlyp@albaughllc.com
EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete

White- EPA File Copy (original) Yellow- Applicant Copy

Form approved. OMB NO. 2070-0060. Approval Expires 1-30-93



United States Environmental Protection Agency Washington, D.C. 20460

Formulator's Exemption Statement

(40 CFR 152.85)

Applicant's Name and Address
Prime Source, a Division of Albaugh
LLC
c/o Albaugh LLC
PO Box 2127
Valdosta, GA 31604-2127

EPA File Symbol/Registration Number 89442-23
Product Name
Bifen 7.9SC Select
Date of Confidential Statement of Formula (EPA Form 8570-4)

As an authorized representative of the applicant for registration of the product identified above, I here certify that:

05/18/2021

- This product contains the following active ingredient(s):
 Bifenthrin
- (2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging of another product which contains that active ingredient, which is registered under FIFRA Section 3, is purchased by us from another producer, and is labeled for at least each use for which my product is proposed to be labeled.

Indicate by checking (A) or (B) below which paragraph applies:
(A) An accurate Confidential Statement of Formula (EPA Form 8570-4) for the above identified product is
attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).
OR
(D) The Orification of the first of the control of

- (B) The Confidential Statement of Formula *(CSF) (EPA Form 8570-4)* referenced above and on file with the EPA is complete, current, and accurate and contains the information required on the current CSF.
- (4) The following active ingredients in this product qualify for the formulator's exemption.

	Source	
Active Ingredient	Product Name	Registration Number
Bifenthrin		
Signature K. A. O. a. t.	Name and Title	Date 05/18/2021
Signature Kerly Pastor	Kerly Pastor, Regulatory Manager	03/10/2021
FDA F 0570 07 (D 7.04)	Milita EDA	Vallana Analiana Anani

EPA Form 8570-27 (Rev. 7-91)

White - EPA copy

Yellow - Applicant copy

5. Date

December 10, 2019

4. Typed Name

Ogongi Ogongi



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

April 17, 2015

Ms. Cheryl Wagner Agent for Prime Source LLC Wagner Regulatory Associates P.O. Box 640 7217 Lancaster Pike, Suite A Hockessin, Delaware 19707

Subject: CSF Notification per PRN 98-10 – Revised Basic CSF and Alternate CSFs 1 and

2

Product Name: Bifen 7.9SC Select EPA Registration Number: 89442-23 Application Date: March 16, 2015

Decision Number: 502582

Dear Ms. Wagner:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The CSFs submitted with your application have been stamped "Notification" and placed in our files.

Please note that the record for this product currently contains the following CSFs:

- Basic CSF dated 03/16/2015
- Alternate CSF 1 dated 03/16/2015
- Alternate CSF 2 dated 03/16/2015

Any CSFs other than those listed above are superseded/no longer valid. If you have any questions, please contact Byron Backus 703-305-5704 or by email at backus.byron@epa.gov.

Sincerely,

Kable Bo Davis, Product Manager 3 Invertebrate & Vertebrate Branch 1 Registration Division (7505P) Office of Pesticide Programs

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⊗EPA	United Environmental F	d States Protection A n, DC 20460	gency	✓ V	Amendm Other	
	Appl	lication for l	Pesticide	- Section	11	
1. Company/Product Numb 89442-23	er		2. EPA Pro Mindy Ondis	duct Manage sh	er	Proposed Classification
4. Company/Product (Nam	e)		PM#			X None Restricted
Prime Source LLC /			25			None Restricted
Bifen 7.9SC Select ABN	: Bifen 7.9F Select					
5. Name and Address of A Prime Source, LLC c/o Wagner Regulatory P.O. Box 640 Hockessin, DE 19707 Checker				oduct is simi	lar or identica	e with FIFRA Section 3(c)(3) al in composition and labeling OTIFICATION APR 1 7 2015
		Sect	tion - II			
Notification - Explain Explanation: Use addition Notification to add addition This notification is consistent we labeling or the confidential state.	onse to Agency letter dates below. al page(s) if necessary. onal producer to CSFs. with the provisions of PR Notement of formula of this pro- at if this notification is not of	(For Section I a bitice 98-10 and EF oduct. I understand consistent with the	Ager "Me Other and Section I PA regulations d that it is a vio	ncy letter dated Too" Application er - Explain bel I.) at 40 CFR 152 plation of 18 U Notice 98-10 ar	on. ow. 2.46, and no ot S.C. Sec. 100	her changes have been made to the 1 to willfully make any false statement .46, this product may be in violation of
			ion - III			
1. Material This Product Child-Resistant Packaging Yes* X No * Certification must be submitted	Unit Packaging Yes X No If "Yes" Unit Packaging wgt.	No. per If "	Yes No Yes" Ckage wgt	No. per container	2. Type of (XX	Container Metal Plastic Glass Paper Other (Specify) HDPE lined bags
Location of Net Contents X Label	s Information Container	4. Size(s) Ret 1, 2.5, 5 gallor		r 5.	X On La	Label Directions bel beling accompanying product
6. Manner in Which Label	s Affixed to Product	100000000000000000000000000000000000000	graph er glued ciled		theradhe	esive backed label
		Sect	ion - IV			•
Contact Point (Complete Name Cheryl Wagner I certify that the statements I I acknowledge that any knowledge that any know	Title Age Certif have made on this form an	e ent for Prime Sol fication d all attachments t	urce, LLC	e, accurate an	Telephone N (302) 635-73 d complete.	ry, to process this application.) No. (Include Area Code) 289 Cheryl@wagnerreg.com 6. Date Application Received (Stamped)
2. Signatura	Sagne	3. Title Agent for Prin	me Source, L	LC.		(Gramped)
4. Typed Name		5. Date				
Cheryl Wagner		March 16th, 2	2015			
	A Form 8570-1 (Rev. 8-			solete		0

resob ission

Davis, Kable

From:

Backus, Byron

Sent:

Friday, April 17, 2015 12:40 PM

To:

Davis, Kable

Subject:

FW: Bifen 7.9SC Select CSF Notification EPA Reg. No. 89442-23.

Attachments:

Bifen 7.9SC Select Alt 1 24Nov2014.doc; Bifen 7.9SC Select Alt 2 24Nov2014.doc

This email has the two corrected alternate CSFs.

From: Cheryl Wagner [mailto:cheryl@wagnerreg.com]

Sent: Thursday, April 16, 2015 3:34 PM

To: Backus, Byron

Subject: RE: Bifen 7.9SC Select CSF Notification EPA Reg. No. 89442-23.

Hi Byron,

Here is corrected alternates.

Sorry about that!!

Regards,

Cheryl Wagner

Wagner Regulatory Associates, Inc.

Telephone: (302) 635-7289

Fax: (302) 635-7295

From: Backus, Byron [mailto:Backus.Byron@epa.gov]

Sent: Thursday, April 16, 2015 2:21 PM

To: Cheryl Wagner

Subject: RE: Bifen 7.9SC Select CSF Notification EPA Reg. No. 89442-23.

OK so far but the two alternate CSFs still have an error in the lower limit for one of the "inerts." [Note: it's the last ingredient in the listing].

From: Cheryl Wagner [mailto:cheryl@wagnerreg.com]

Sent: Thursday, April 16, 2015 2:14 PM

To: Backus, Byron Cc: Davis, Kable

Subject: RE: Bifen 7.9SC Select CSF Notification EPA Reg. No. 89442-23.

Hello,

Attached is the revised submission.

Regards,

Cheryl Wagner

Wagner Regulatory Associates, Inc.

Telephone: (302) 635-7289 Fax: (302) 635-7295

From: Backus, Byron [mailto:Backus.Byron@epa.gov]

Sent: Thursday, April 16, 2015 2:03 PM

To: Cheryl Wagner Cc: Davis, Kable

Subject: Bifen 7.9SC Select CSF Notification EPA Reg. No. 89442-23.

In addition to the items noted in my previous email, could you also change the name of the product manager from Mindy Ondish to Kable Davis?

Again, if you have any questions, please contact Byron Backus at 703-305-5704 or by email at backus.byron@epa.gov.

March 16th, 2015

Document Processing Desk (NOTIF) ATTN: Mindy Ondish (PM 25) Registration Division (7505P) U.S. Environmental Protection Agency Office of Pesticide Programs One Potomac Yard 2777 South Crystal Drive Arlington, Virginia 22202 WRA

Wagner Regulatory Associates, Inc. P.O. Box 640 7217 Lancaster Pike, Suite A Hockessin, Delaware 19707

Re: Bifen 7.9SC Select ABN: Bifen 7.9F Select, EPA Reg. No. 89442-23 Notification of Revised Confidential Statement of Formulas

Dear Ms. Ondish:

Wagner Regulatory Associates, Inc., as agent for Prime Source LLC, respectfully notifies the Agency that an additional production facility has been added to Box 2 of the Basic, Alternate 1, and Alternate 2 Confidential Statement of Formulas. These revised CSFs will replace all current EPA approved CSFs dated November 24th, 2014.

In support of this request, the following documents and studies are attached:

- Letter from Prime Source LLC, appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Registration (8570-1)
- 2 copies of the revised CSF

Please feel free to contact me via email at cheryl@wagnerreg.com or telephone at (302) 635-7289.

Respectfully submitted,

Cheryl Wagner

Agent for Prime Source LLC

Change & Wagne

Enclosures

p.6

Prime Source, LLC. 4609 E. Boonville-New Harmony Road, Evansville, IN 47725

U.S. Environmental Protection Agency Office of Pesticide Programs (7505P) One Potomac Yard 2777 South Crystal Drive Artington, VA 22202

State Pesticide Product Regulatory Agencies in the United States

Re: Designation of Agent for: Prime Source, LLC,

Dear Sir or Madam:

This letter serves as notification that Prime Source, LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding all state and federal regulatory matters relative to products that Prime Source, LLC will register with US EPA and state regulatory authorities. Prime Source, LLC hereby authorities EPA and state regulatory authorities to contact any of the following individuals within WRA, Inc.:

EPA Contacts (Any of the following individuals may be contacted by EPA on our behalf)

James M. Wagner
Managing Director
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7290
Fax: (302) 635-7295
Email: james@wagnerreg.com

Cheryl R. Wagner
President
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7289
Fax: (302) 635-7295
Email: Cheryl@wagnerreg.com

Lori Kohler
Regulatory Associate
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7281
Fax: (302) 635-7295
Email: lori@wagnerreg.com

State Contacts (Any of the following individuals may be contacted by state regulatory authorities on our behalf)

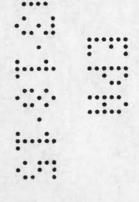
Barbarette Young-Henry Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin. DE 19707 Telephone: (302) 635-7279 Fax: (302) 635-7295 Email: Barbarette@wagnerreg.com Cheryl Wagner
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7289
Fax: (302) 635-7295
Email: Cheryl@wagnerreg.com

1318

Authorization to contact these staff members within WRA, Inc remains in effect until such time that Prime Source, LLC provides notification in writing of any changes.

Respectfully submitted.

Keith Montgomery Sales Manager





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

March 10, 2015

Cheryl Wagner
Prime Source, LLC
c/o Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707

Subject:

Label Notification per PRN 98-10 - Add Alternate Brand Name

Product Name: BIFEN 7.9SC SELECT EPA Registration Number: 89442-23 Application Date: February 27, 2015

Decision Number: 500551

Dear Ms. Wagner:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped "Notification" and will be placed in our records.

The alternate brand name Bifen 7.9F Select has been added to the product record.

If you have any questions, please contact Maggie Rudick at 703-347-0257 or by email at rudick.maggie@epa.gov.

Sincerely,

Kable Bo Davis, Product Manager 3 Invertebrate & Vertebrate Branch 1

Magging Rulick for

Registration Division (7505P) Office of Pesticide Programs

Notification Labor Asseptable v 2014 (1) d.

WRA

February 27th, 2015

Document Processing Desk (NOTIF)
ATTN: Mindy Ondish (PM 25)
Registration Division (7505P)
U.S. Environmental Protection Agency
Office of Pesticide Programs
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202

Wagner Regulatory Associates, Inc. P.O. Box 640 7217 Lancaster Pike, Suite A Hockessin, Delaware 19707

Re: Bifen 7.9SC Select, EPA Registration No. 89442-23 - Notification of Alternate Brand Name

Dear Ms. Ondish:

Wagner Regulatory Associates, Inc., as agent for Prime Source LLC, is submitting a notification of an alternate brand name – **Bifen 7.9F Select**. In support of this request, the following documents and studies are attached:

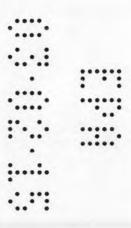
- · Letter from Prime Source, LLC appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Registration (8570-1)
- · A copy of the label

Please feel free to contact me via email at cheryl@wagnerreg.com or telephone at (302) 635-7289

Respectfully submitted,

Cheryl Wagner Agent for Prime Source LLC

Enclosures



Please read instructions on rever	se before cor. g for	m.	_	Form Appr			oval expires 05-31-98
	20.00				_agistr	ration OPP I	dentifier Number
€EPA =		States	Agamau		Amend	ment	
ACLW :	nvironmental P		Agency		1000		
	Washington	n, DC 20460		V	Other		
	Appl	ication fo	r Pesticide				
Company/Product Number			2. EPA Pro	duct Manag	jer	3. Proposed	d Classification
89442-23			Mindy Ondi	sh			
4. Company/Product (Name)			PM#	7		X None	Restricted
Prime Source LLC / Bifen 7.9	SC Select		25			[Z] None	Nestricted
5. Name and Address of App	licant (Include Zip Co	de)				nce with FIFRA S	
Prime Source, LLC			(b)(l), my pr	roduct is sim	nilar or ident	ical in composition	n and labeling
c/o Wagner Regulatory A	ssociates, Inc.		EPA Reg. N	No.			
P.O. Box 640 Hockessin, DE 19707			Product Na	me.			
The state of the s	if this is a new addres	S	Product Na				
			ction - II				
Amendment - Explain be	elow.		Fina	I printed labe		e to	
Resubmission in respon	se to Agency letter dated	d		ncy letter date Too" Applica		-	_
Notification - Explain bel				er - Explain be			
The second secon		/F 0					
Explanation: Use additional	page(s) if necessary.	(For Section	l and Section I	11.)			
Notification of Alternate Bra							
This notification is consistent with labeling or the confidential statem							
to EPA. I further understand that	if this notification is not o	consistent with t	the terms of PR N	Notice 98-10			
FIFRA and I may be subject to er	norcement action and pe		ction - III	4 OI FIFRA.			
Material This Product Wi	Il Be Packaged In:	06	CHOII - III				
Child-Resistant Packaging	Unit Packaging		Water Soluble	Packaging	2. Type o	of Container	
Yes*	Yes		Yes			Metal	
X No	X No		X No		X	Plastic	
	If "Yes"	No. per	If "Yes"	No. per		Glass	
* Certification must	Unit Packaging wgt.	container	Package wgt	container		Paper	
be submitted						Other (Specify) HDPE lined bags
Location of Net Contents I	nformation	4 Size(s) F	Retail Containe	r 5	Location	of Label Directions	
	ntainer	1, 2.5, 5 gal				Label	
LA conor	itanioi	1, 2.0, 0 ga	iiotio			Labeling accompa	anying product
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6. Manner in Which Label is	Affixed to Product		hograph		Otherac	dhesive backed la	bel
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Contact Point (Complete it Name	ems airectly below for		of individual to	be contact		e No. (Include Age	
Cheryl Wagner	111790	ent for Prime S	Source, LLC			-7289 Cheryl@wa	
		ication				6. Date Applic	
I certify that the statements I have I acknowledge that any knowing						Received *	
both under applicable law.							imped)
2. Signatura PW	gne.	3. Title		7.		:	•••
	9	Agent for F	Prime Source, I	LLC.			**
4. Typed Name		5. Date					
Cheryl Wagner		February 2	27 th , 2015				

Prime Source, LLC. 4609 E. Boonville-New Harmony Road, Evansville, IN 47725

U.S. Environmental Protection Agency Office of Pesticide Programs (7505P) One Potomac Yard 2777 South Crystal Drive Artington, VA 22202

State Pesticide Product Regulatory Agencies in the United States

Re: Designation of Agent for: Prime Source, LLC,

Dear Sir or Madam:

This letter serves as notification that Prime Source, LLC has appointed Wagner Regulatory Associates, inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding all state and federal regulatory matters relative to products that Prime Source, LLC will register with US EPA and state regulatory authorities. Prime Source, LLC hereby authorizes EPA and state regulatory authorities to contact any of the following individuals within WRA, Inc.:

EPA Contacts (Any of the following individuals may be contacted by EPA on our behalf)

James M. Wagner Managing Director Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 Telephone: (302) 635-7290 Fax: (302) 635-7295 Email: james@wagnerreg.com

Cheryl R. Wagner President Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 Telephone: (302) 635-7289 Fax: (302) 635-7295 Email: Cheryl@wagnerreg.com

Lori Kohler Regulatory Associate Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 Telephone: (302) 635-7281 Fax: (302) 635-7295 Email: lori@wagnerreg.com

State Contacts (Any of the following individuals may be contacted by state regulatory authorities on our behalf)

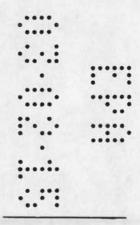
Barbarette Young-Henry Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 Telephone: (302) 635-7279 Fax: (302) 635-7295 Email: Barbarette@wagnerreg.com

Cheryl Wagner Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 Telephone: (302) 635-7289 Fax: (302) 635-7295 Email: Cheryl@wagnerreg.com

Authorization to contact these staff members within WRA, Inc remains in effect until such time that Prime Source, LLC provides notification in writing of any changes.

Respectfully submitted.

Keith Montgomery Sales Manager





UNITED TES ENVIRONMENTAL PROTECTION GENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Note to File

Date: February 11, 2015

File Symbol: 89442-EG

Decision Number: 497710

PM/RM: Kable Davis/Julie Chao Zung Amelle

Background: The Similarity Clinic Memorandum signed on 12/12/14 states that the subject product is not substantially similar to EPA Reg. No. 53883-117, the cited product. However, further review of the product files reveals that the subject product is, in fact, identical to the cited product. The Similarity Clinic Memorandum also indicates that Child Resistant Packaging is required, due to the acute oral LD50.

Decision: As the products are identical, the subject product may rely on the acute toxicity and product chemistry data for the cited product. Furthermore, although the toxicity criterion for Child Resistant Packaging in 40 CFR 157.22(a) is met, the use criterion in 40 CFR 157.22(b) has not been met. The product cannot be reasonably interpreted to permit residential use. The label states that the product is intended for commercial use. Therefore, based on the use patterns for the product, Child Resistant Packaging will not be required.

Chao, Julie

From:

KT Woodall ktwoodall@wagnerreg.com

Sent:

Wednesday, February 11, 2015 9:11 AM

To: Cc: Chao, Julie Cheryl Wagner

Subject:

RE: 89442-EG and 89442-EU: Label Comments

Attachments:

89442.xxxxx.20141124.V2 - Clean.pdf; 89442.xxxxx.20141124.V2 - Highlighted.pdf; 89442.xxxxx.20141126.V2 - Clean.pdf; 89442.xxxxx.20141126.V2 - Highlighted.pdf

Morning Julie - Please see the attached 2 labels (clean and highlighted). Let me know if you need anything else.

Thanks for all your help!

Kt Woodall

Wagner Regulatory Associates, Inc. 7217 Lancaster Pike, Suite A Hockessin. DE 19707

302.635.7281 | Fax: 302.635.7295 KtWoodall@wagnerreg.com

From: Chao, Julie [mailto:Chao.Julie@epa.gov]
Sent: Tuesday, February 10, 2015 1:35 PM

To: Cheryl Wagner

Subject: 89442-EG and 89442-EU: Label Comments

Hi Cheryl,

Please see the attached label comments for two pending applications: 89442-EG (Bifen 7.9SC Select) and 89442-EU (Bifen G/N 7.9 SC Select). Let me know if you have any questions. Otherwise, you may email the revised labels directly to me.

Thanks, Julie

Julie Chao, MA, MSPH Invertebrate & Vertebrate Branch 1 Registration Division Office of Pesticide Programs 703.308-8735 (phone)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION
OFFICE OF PESTICIDE PROGRAMS REGISTRATION DIVISION (7505P)

21-F5-10

DP BARCODE No.: <u>D425138</u>; FILE SYMBOL No.: <u>89442-EG</u>; PRODUCT NAME: <u>Bifen 7.9 SC Select</u>;

DECISION No.: 497710; PC Code(s): 128825; ACTION CODE: R300; FOOD Use: No

DATE OUT:

January 27, 2015

SUBJECT:

Product Chemistry Review for end use product

Product Name: Bifen 7.9SC Select

FROM:

Shyam Mathur,

Product Chemistry Team Leader

CITAB/RD (7505P)

TO:

Julie Chao / Kable Davis, RM 03

IV 1 Branch / RD (7505P)

Company Name:

Prime Source LLC

Formulation Type:

Insecticide

INTRODUCTION:

The registrant has submitted an application for the registration of the new end use product "Bifen 7.9 SC Select". The registrant has submitted a CSF for basic formulation and two CSF's alternate formulations # 1 to #2 (all dated November 24, 2014). The registrant has claimed that the proposed product is identical in chemical composition to the registered product with Reg. No. 53883-117 and therefore has cited the product chemistry data with MRID No. 46116201 to support the registration of the proposed product. The registrant has also requested waivers for few of the group B product chemistry data. CITAB has been asked to determine the acceptability of the proposed basic & alternate CSF's and the cited product chemistry data. As well as determine similarity to the cited product.

SUMMARY OF FINDINGS:

- 1. Name of Active Ingredient(s): Bifenthrin (7.9%)
- 2. Has the registrant claimed substantial similarity to a registered product?

[X] Yes; [] No; [] NA; if yes, give the registration number of the cited product.

EPA Reg. No: 53883-117

- 3. All of the source materials of the active ingredient are derived from registered sources- [X] Yes; [] No
- 4. All inert ingredients have been screened by IIAB and found to be approved for the proposed labeled uses. [X] Yes; [] No

DP BARCODE No.: <u>D425138</u>; FILE SYMBOL No.: <u>89442-EG</u>; PRODUCT NAME: <u>Bifen 7.9 SC Select</u>; DECISION No.: <u>497710</u>; PC Code(s): <u>128825</u>; ACTION CODE: <u>R300</u>; FOOD Use: <u>No</u>

DP BARCODE No.: <u>D425138</u>; FILE SYMBOL No.: <u>89442-EG</u>; PRODUCT NAME: <u>Bifen 7.9 SC Select</u>; DECISION No.: <u>497710</u>; PC Code(s): <u>128825</u>; ACTION CODE: <u>R300</u>; FOOD Use: No

7. Group A: Cited from Reg. No. 53883-117

TRB's determination of the acceptability for the proposed product is listed in the tables below.

Guideline No.	Study Title		Data submitted		TRB's Assessment	MRID Nos.
140.	Study Title		Yes	No	of Data	
830.1550	Product Ider	ntity & Composition	cited		Α	46116201
830.1600	Description produce the	of materials used to product	cited		A	46116201
830.1650	Description of formulation process		cited		A	46116201
830.1670	Discussion on the formation of impurities		cited		A	46116201
830.1700	Preliminary analysis		NA			
		Standard certified limits	x		A	
	Certified	Proposed limits				
830.1750	limits (158.350)	Justifications for wider limits				Basic CSF dated 11-24-2014
830.1800	Enforcemen	t analytical method	cited		A	4616201 (validation provided along with accelerated storage stability study; JRF Study No. 3220)

A = Acceptance, N = Not Acceptable, G = Data Gap, W = Waiver Request, I = In Progress, NA = Not Applicable; U = Upgradeable.

DP BARCODE No.: <u>D425138</u>; FILE SYMBOL No.: <u>89442-EG</u>; PRODUCT NAME: <u>Bifen 7.9 SC Select</u>; <u>DECISION No.: 497710</u>; PC Code(s): <u>128825</u>; ACTION CODE: <u>R300</u>; FOOD Use: <u>No.</u>

8. Group B: Cited from Reg. No. 53883-117

Guideline No.	Study Title	Value or Qualitative Description	TRB's Assessm ent of Data	MRID Nos. Cited
830.6303	Physical State	Liquid @21.8°C	cited	46116201
830.6315	Flammability	Does not contain combustible liquid	cited	Data matrix dated 11-24- 2014
830.6316	Explodability	Does not contain explosive properties	cited	u u u
830.7000	рН	5.8-6.2@21.8°C	cited	46116201
830.7300	Density	8.65 lbs/gal @21.6°C	cited	46116201
830.7100	Viscosity	600-700 cPs @20°C	cited	46116201
830.6314	Oxidation/reduction	Not oxidizing or reducing agent	cited	Data matrix dated 11-24- 2014
830.6317	Storage stability	Chemically stable for one year under warehouse conditions in commercial HDPE containers	cited	46116201
830.6320	Corrosion characteristics	No corrosion, leakage, or color was seen on the containers during one year storage in commercial containers	cited	46116201

A = Acceptance, N = Not Acceptable, G = Data Gap, W = Waiver request, NA = Not applicable, I = In progress; U = Upgradeable.



DECISION No.: 497710; PC Code(s): 128825; ACTION CODE: R300; FOOD Use: No

CONCLUSIONS:

The CITAB has reviewed the product chemistry data cited to support the registration of the proposed end-use product and has concluded that:

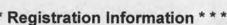
- 1. The proposed revised basic CSF (dated 11-24-2014) is acceptable.
- 2. The proposed alternate CSF's #1 to #2 (all dated 11-24-2014) are acceptable.
- 3. The product chemistry data cited corresponding to guidelines 830.1550 (product identity & composition), 830.1600 (description of materials used to produce the product), 830.1650 (description of the formulation process), 830.1670 (discussion on the formation of impurity), 830.1750 (certified limits), and 830.1800 (enforcement analytical method) are acceptable.
- 4. The product chemistry data cited corresponding to guideline 830 series group B (physical chemical properties) are acceptable, including the cited data for the guidelines 830.6317 (storage stability) and 830.6320 (corrosion characteristics).
- 5. The proposed product with File Symbol No. 89442-EG was determined to be identical in chemical composition to the cited product with Reg. No. 53883-117 and therefore, the cited product chemistry will also support the registration application for the proposed end use product.



Date: 21-Jan-2015

Page 1 of 2





Decision #: 497710 DP #: (425138)

PRIA

Parent DP #:

Submission #: 961015

E-Sub #:

1-66

Registration:	89442-EG - BIFEN 7.95C S	ELECT			(1/30)	20
Company:	89442 - PRIME SOURCE, LLC				K413L	61
Risk Manager:	RM 03 - Kable Davis - (703) 306-0	415 Room# PY1 S-	7723			
Risk Manager Reviewer:	Julie Chao JCHAO					
Sent Date:		PRIA Due Date:	17-Apr-2015	Edited	Due Date:	
Type of Registration:	Product Registration - Section 3					
Action Desc:	(R300) NEW PRODUCT; OR SIMIL	LAR COMBINATION	PRODUCT (ALI	READY REGISTERED)	
Ingredients:	128825, Bifenthrin(7.9%)				-	
	* * * Data	Package Info	ormation *	* *		-
Expedite:	○ Yes ● No	Date Sent:	21-Jan-2015		Due Back:	
DP Ingredient:	128825, Bifenthrin					
DP Title:	Product Chemistry					
CSF Included:	● Yes ○ No Label Incl	luded: • Yes O	No Paren	t DP #:	_	
Assigned To		Date In	Date Out			
Organization: RD / C	CITAB			Last Possible Science	Due Date: 16-Feb-2015	/
Team Name: CHEM				Science	Due Date:	
Reviewer Name: S	hyans Males of	-26-15	01-2711	Sub Data Package	Due Date:	

* * * Studies Sent for Review * * *

Printed on Page 2

* * * Additional Data Package for this Decision * * *

Can be printed on its own page

* * * Data Package Instructions * * *

45-day screen due date: February 2, 2015

Please review MRID 46116201, which is being cited to fulfill the product chemistry requirements for 89442-EG, a proposed new product containing bifenthrin. The applicant has requested waivers for certain Group B requirements (guidelines 830.6314, .6315, .6316, .6319, .6321). A copy of the submission cover letter, letter of authorization, data matrix, proposed label, and proposed CSFs (Basic, Alternate 1, Alternate 2) are enclosed. Please let me know if you need any additional information. Thank you.

53883-117 Church NO MPID NO

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

SIMILARITY CLINIC MEMORANDUM:

Subject:

EPA Reg. No.: 89442-EG/Bifen 7.9SC Select

DP Barcode: 424459

PC Code: 128825

From:

Marianne Lewis, Biologist

Insecticides/Rodenticides Branch Registration Division (7505P)

To:

Kable Davis, PM 3

IVB1

Registration Division (7505P)

Applicant:

Prime Source, LLC

c/o Wagner Regulatory Associates, Inc.

P.O. Box 640

Hockessin, DE 19707

FORMULATION FROM EPA Reg. No. 89442-EG LABEL:

 Active Ingredient(s):
 % by wt.

 Bifenthrin:
 7.9%

 Inert Ingredient(s):
 92.1%

 Total
 100.0%

BACKGROUND: The registrant is claiming substantial-similarity to EPA Reg. No. 53883-117 and is citing specific MRID's to support the registration of their new product, EPA Reg. No. 89442-EG. The MRID's are as follows: 414136-02 (81-1), 414136-03 (81-2), 414136-04 (81-3), 414136-05 (81-4), 414136-06 (81-5), and 414136-07 (81-6).

After comparing the CSF's, the subject product is not substantially similar to EPA Reg. No. 53883-117. However, after comparing the CSF's from the subject product and the test material used in the cited studies, it has been determined that the cited studies may be used to support the registration of the subject product.

Therefore, the following acute toxicity categories will be assigned to the subject product: acute oral (81-1) – III; acute dermal (81-2) – III; acute inhalation (81-3) – III; primary eye irritation (81-4) – IV; primary skin irritation (81-5) – IV; and will be classified as a non sensitizer (81-6).

RECOMMENDATIONS:

- The subject product will be assigned the Toxicity Categories listed above.
- The subject product will be classified as a non sensitizer.
- The acute oral LD₅₀ = 632 mg/kg. Since this not a Restricted Use Product it has to be in Child Resistant Packaging.

The acute toxicity profile for EPA Reg. No. 89442-EG is currently:

Acute Oral III $LD_{50} = 632 \text{ mg/kg}$

Acute Dermal III
Acute Inhalation III
Primary Eye IV
Primary Dermal IV

Skin sensitization non sensitizer

NOTE: The acute toxicity requirements have been satisfied for the subject product.

Page of 3

LABELING:

ID#: 089442-EG

BIFEN 7.9SC SELECT

CHILD RESISTANT PACKAGING REQUIRED:

Due to acute oral $LD_{50} = 632 \text{ mg/kg}$

SIGNAL WORD:

CAUTION

HAZARDS TO HUMANS AND DOMESTIC ANIMALS:

Harmful if swallowed. Harmful if absorbed through skin. Harmful if inhaled. Avoid contact with eyes, skin, or clothing. Avoid breathing spray mist or vapor. Wear long sleeved shirt, long pants, shoes, socks and chemical resistant gloves (such as or made out of any waterproof material, selection category A).

FIRST AID:

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

USER SAFETY RECOMMENDATIONS:

User should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

User should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

21-Day Screen Completed by Contractor

21-Day Expires on 12-17-14

Jacket #<u>89442-EG</u> MRID#

Content Screen: Recommend to Pass Fail

11-3 Review: Pass/Fail/NA

Overall Status: Recommend to Pass/Fail

Transfer This Jacket to:

STEPHEN SCHAIBLE

PRIA 3 – 21 Day Content Screen Review Worksheet (EPA/OPP Use Only)

21 Day Screen Start Date: //-26-1	Septembe	er 2012	
Experts In-Processing Signature:	B.B.		Date 12-2-14 Fee Paid: Yes
Division management contacted on issues	No	Yes_	Date

EPA	Reg. Number: 89442-E6 EPA Receipt Date: //-	26-1	4			
Items for Review					No	N/A*
1	Application Form (EPA Form 8570-1) signed & complete inclutype	X				
•	Confidential Statement of Formula all boxes completed, form stated (EPA Form 8570-4)	40, 100 to 100 t				
2	a) All inerts, including fragrances, approved for the proposed uses (see Footnote A) yes no					
Certification with Respect to Citation of Data (EPA Form 8570-34) completed and signed (N/A if 100% repack)				X		
	Certificate and data matrix consistent					
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)	yes	no			
	If applicable, is there a letter of Authorization for exclusive use or	nly.				
4	Formulator's Exemption Statement (EPA Form 8570-27) completed and					
	Data Matrix (EPA Form 8570-35) both internal and external copies (PR 98-5) completed and signed (N/A if 100% repack)					
5	a) Selective Method (Fee category experts use)	yes	no	11/25	THE STATE OF	-
	b) Cite-All (Fee category experts use)					
	c) Applicant owns all data (Fee category experts use)					
6	6 5 Copies of <u>Label</u> (<u>Electronic labels on CD</u> are encouraged and guidance is available)					
7	7 Is the data package consistent with PR Notice 86-5					X
8	Notice of Filing included with petitions					X

9	If applicable for conventional applications, reduced risk rationale			X
	Required Data and/or data waivers. See Footnote C.		**	
	a) List study (or studies) not included with application			
10		4	(e)	

Comments:

* 211 forms submitted

* No studies submitted w/ application

* Theres approved For NON-FOOD USC

* Jacket Passo

50 peplit

MRID: None

Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses or have an application pending with the Agency. If an unapproved inert with no application pending with the Agency is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are strongly encouraged to verify that all inert ingredients have been approved for the application's uses or have an application pending with the Agency even if a product is currently registered by consulting the inert Web site and if the inert is not approved nor has an application pending with the Agency, to obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient. Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at inertsbranch@epa.gov and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the Chief of Microbial Pesticides Branch.

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

Unapproved Inerts Identified on CSFs

All applications except conventional new products and PIPs

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

- Correct the application by, for instance, correcting the inert's identity or CAS
 number, providing documentation that the inert has been approved, or
 removing the unapproved inert from the CSF or replacing it with one that is
 approved for the application's uses; or
- Provide the required information necessary to identify an inert approval application that is pending with the Agency; or
- Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;
- 4. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R300 or R301), it will contact the applicant with the following options:

- Correct the application by, for instance, correcting the inert's identity or CAS
 number, providing documentation that the inert has been approved, or
 removing the unapproved inert from the CSF or replacing it with one that is
 approved for the application's uses; or
- 2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

- Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
- 2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.
- 3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

- B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.
- C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

December 1, 2014

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

OPP Decision Number: D-497710

EPA File Symbol or Registration Number: 89442-EG

Product Name: BIFEN 7.9SC SELECT EPA Receipt Date: 26-Nov-2014

EPA Company Number: 89442

Company Name: PRIME SOURCE, LLC

CHERYL WAGNER
WAGNER REGULATORY ASSOCIATES, INC
PRIME SOURCE, LLC
PO Box 640
HOCKESSIN, DE 19707-

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application and certification of payment. If you submitted data with this application, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R300 NEW PRODUCT; OR SIMILAR COMBINATION PRODUCT (ALREADY REGISTERED) TO AN IDENTICAL OR SUBSTANTIALLY SIMILAR IN COMPOSITION AND USE TO A REGISTERED PRODUCT; REGISTERED SOURCE OF ACTIVE INGREDIENT; NO DATA REVIEW ON ACUTE TOXICITY, EFFICACY OR CRP - ONLY PRODUCT CHEMISTRY DATA; CITE-ALL DATA CITATION, OR SELECTIVE DATA CITATION WHERE APPLICANT OWNS ALL REQUIRED DATA, OR APPLICANT SUBMITS SPECIFIC AUTHORIZATION LETTER FROM DATA OWNER; CATEGORY ALSO INCLUDES 100% RE-PACKAGE OF REGISTERED END-USE OR MANUFACTURING-USE PRODUCT THAT REQUIRES NO DATA SUBMISSION NOR DATA MATRIX;

No additional payment is due at this time.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-9362.

Sincerely,

Front End Processing Staff

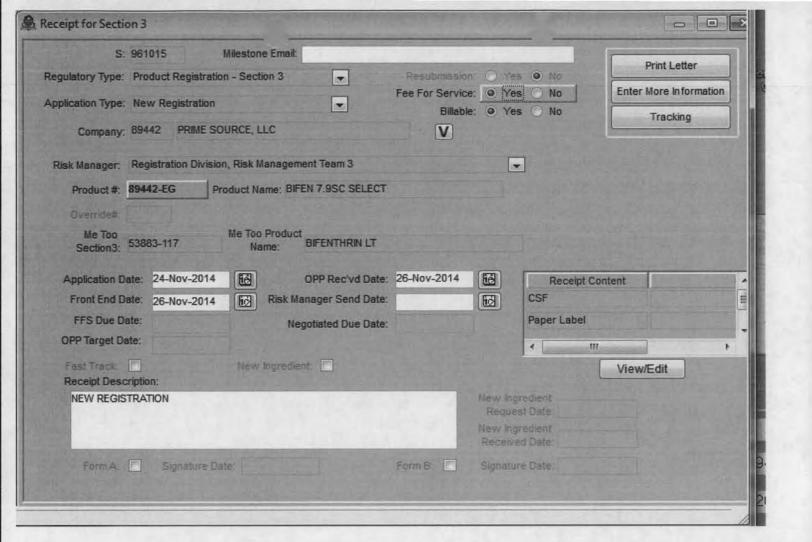
Information Technology & Resources Management Division

Fee for Service

{961015v~

This package includes the following	for Division
New RegistrationAmendment	○ AD ○ BPPD ○ RD
□ Studies? □ Fee Waiver? □ volpay % Reduction:	Risk Mgr. 3
Receipt No. S- EPA File Symbol/Reg. No. Pin-Punch Date:	961015 89442-EG 11/26/2014
This item is NOT subject to	o FFS action.
Action Code: Requested: R300 Granted: R300 Amount Due: \$ 500	Parent/Child Decisions:
Inert Cleared for Intended Use Reviewer: Kmmh Remarks: Has 2 2 4	Uncleared Inert in Product Date: 12/1/4

Sim Clinic Needed



Cheryl Wagner

From:

pay.gov.clev@clev.frb.org

Sent:

Tuesday, November 25, 2014 4:11 PM

To:

Cheryl Wagner

Subject:

Pay.gov Payment Confirmation: PRIA Service Fees

Your payment has been submitted to Pay.gov and the details are below. If you have any questions regarding this payment, please contact Michael Yanchulis at (703) 347-0237 or by email at yanchulis.michael@epa.gov.

Application Name: PRIA Service Fees Pay.gov Tracking ID: 25IJTCGV Agency Tracking ID: 74713132066

Transaction Type: Sale

Transaction Date: 11/25/2014 04:11:28 PM EST

Account Holder Name: Cheryl R. Wagner

Transaction Amount: \$1,506.00 Billing Address: 7217 Lancaster Pike

Billing Address 2: Suite A

City: Hockessin State/Province: DE Zip/Postal Code: 19707

Country: USA

Card Type: AmericanExpress
Card Number: ********2008

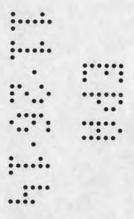
Registration Number:

Company Name: Prime Source LLC

Company Number: 89442

Action Code: R300

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.





Receipt

Your payment is complete

Pay.gov Tracking ID: 25IJTCGV Agency Tracking ID: 74713132066

Form Name: Pesticide Registration Improvement Act - Prepayment

Application Name: PRIA Service Fees

Payment Information

Payment Type: Debit or credit card Payment Amount: \$1506.00

Transaction Date: 11/25/2014 04:11:28 PM EST

Payment Date: 11/25/2014 Registration Number:

Company Name: Prime Source LLC

Company Number: 89442 Action Code: R300

Account Information

Card Holder Name: Cheryl R. Wagner Billing Address: 7217 Lancaster Pike

Billing Address 2: Suite A

City: Hockessin Country: United States State/Province: DE ZIP/Postal Code: 19707 Card Type: American Express Card Number: **********2008

Email Confirmation Receipt

Confirmation Receipts have been emailed to:

cheryl@wagnerreg.com



Please read instructions on reverse before co	or og form.	For	m Appru	OMB No. 2	070-0060. Appro	val expire	s 05-31-98
	United States nental Protection Washington, DC 20460	Agency	X	Registrat Amendme		entifier N	umber
	Application for	r Pesticide - S	ectio	n I			
Company/Product Number 89442-		2. EPA Product Mindy Ondish	Manage	er	3. Proposed	Classific	ation
4. Company/Product (Name)		PM#			X None		estricted
Prime Source LLC/Bifen 7.9SC Select		25			None	1	estricted
5. Name and Address of Applicant (Incl Prime Source, LLC c/o Wagner Regulatory Associates, P.O. Box 640 Hockessin, DE 19707 Check if this is a least	Inc.	6. Expedited Re (b)(l), my producto: EPA Reg. No. 53	t is simi 3883-11	lar or identica 7			
	Se	ction - II					
Amendment - Explain below. Resubmission in response to Agence Notification - Explain below. Explanation: Use additional page(s) if		Agency le "Me Too" Other - Ex	etter date Applicati	on.			
	So	ction - III	-		_		
1. Material This Product Will Be Pack		Cuon - III		_			
Child-Resistant Packaging Yes* X No If "Yes" * Certification must be submitted	Yes No No. per		o. per	2. Type of C	Container Metal Plastic Glass Paper Other (Specify)	HDPE li	ned bags
Location of Net Contents Information X Label Container	4. Size(s) F 1, 2.5, 5 gal	Retail Container	5.	X On La	abel Directions bel beling accompa		oduct
6. Manner in Which Label is Affixed to F	X Pa	hograph per glued enciled		Otheradhe	esive backed lat	pel	
	Sec	ction - IV					
Contact Point (Complete items direct		of individual to be	contacte				
Name Cheryl Wagner	Title Agent for Prime S	Source, LLC		(302) 63	ne No. (Include 5-7289 *** wagnerreg.com		de)
I certify that the statements I have made on I acknowledge that any knowingly false or m both under applicable law.				d complete.	6. Date Applic Received		: ::
2. Signature	3. Title						
Cheux Wagner	Agent for F	Prime Source, LLC.					
4. Typed Name	5. Date			1	:		
Cheryl Wagner	November	24, 2014			9.5		

This is a reproduction of EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete.

FEDERAL EXPRESS

November 24, 2014

Document Processing Desk (REGFEE)
ATTN: Mindy Ondish (PM 25)
Registration Division (7505P)
U.S. Environmental Protection Agency
Office of Pesticide Programs
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202



Wagner Regulatory Associates, Inc. P.O. Box 640 7217 Lancaster Pike, Suite A Hockessin, Delaware 19707

Re: Application to register a new product that is a "me-too" of a currently registered product - "Bifen 7.9SC Select"

Dear Ms. Ondish:

Wagner Regulatory Associates, Inc., as agent for Prime Source LLC, is requesting registration of the above referenced product. This product is identical in labeling and composition to the product Bifenthrin LT EPA Registration Number 53883-117. Control Solutions, Inc. has provided Prime Source, LLC authorization to cite data used to support to the registration of Bifenthrin LT. In support of this request, enclosed are the following documents:

- · Letter from Prime Source LLC, appointing Wagner Regulatory Associates, Inc. as its agent
- Letter of authorization from Control Solutions, Inc.
- Application for Pesticide Registration (8570-1)
- Confidential Statement of Formula (8570-4), 2 copies
- Formulator's Exemption Statement (8570-27)
- Data Matrix, EPA internal and public copies (8570-35)
- Draft labeling, 2 copies and CD
- Statement with Respect to Label Integrity
- A copy of the EPA approved label for EPA Reg. No. 53883-117
- A copy of the receipt confirming payment of the required registration fees

If you have any questions about this submission please contact the undersigned at (302) 635-7289 or cheryl@wagnerreg.com.

Respectfully submitted,

Cheryl Wagner

Agent for Prime Source LLC

Enclosures



November 20, 2014

Bo Davis (PM 3) **Document Processing Desk** Office of Pesticide Programs (7504P) U.S. Environmental Protection Agency Room S-4900, One Potomac Yard 2777 S. Crystal Drive Arlington, VA 22202

Subject:

Letter of Authorization for Prime Source, LLC

Permission to Cite Data

Dear Mr. Davis:

Please let this letter serve to notify the U.S. Environmental Protection Agency that Control Solutions, Inc. (EPA Co. No. 53883) allows Prime Source, LLC (EPA Co. No. 89442) to cite product chemistry data in support of an application for registration of their Bifenthrin 7.9% end use product.

This data is proprietary to Control Solutions, Inc., and this letter does not confer ownership or exclusive rights of the data. In addition, the authorization is solely for the citation of data and does not authorize the release of these studies to Prime Source, LLC or any other party. Below is a list of the studies that Prime Source, LLC is authorized to cite:

> MRID Number 46116201

Please feel free to contact me should you have any questions.

Sincerely,

Sion Adamson



Professional

Lisa Adamson

Regulatory Group Leader| Regulatory Affairs D+1-281-892-2522 E ladamson@controlsolutionsinc.com



Product ingredient source information may be entitled to confidential treatment

Form approved. OMB No. 2070-0060, 2070-0057, 2070-0107, 2070-0122, 2070-0164.



United States
Environmental Protection Agency
Washington, DC 20460

Formulator's Exemption Statement

(40 CFR 152.85)

Applicant's Name and Address

Prime Source LLC

c/o Wagner Regulatory Associates, Inc.

P.O. Box 640

Hockessin, DE 19707

EPA File Symbol/Registration Number 89442-

Product Name

Bifen 7.9SC Select

Date of Confidential Statement of Formula (EPA Form 8570-4)

11/24/2014

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Bifenthrin

- (2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).
- (3) Indicate by checking (A) or (B) below which paragraph applies:
- (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement.

 That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

- (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.
- (4) The following active ingredients in this product qualify for the formulator's exemption.

Source				
Active Ingredient Bifenthrin	Product Name	Regis	tration Number	
Signature Looch	Name and Title Cheryl Wagner, Agent	Date 11/24/2014	****	
EPA Form 8570-27 (Rev. 06-2004)		C	opy 5 - EPA	

Copy 2 - Applicant copy

....



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 1200 Pennsylvania Avenue, N.W. WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send

comments regarding burden estimate or any other aspect of this collection of information, inc Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Ave to this address.						
Certification with Respect to	Citation of	Data				
Applicant's/Registrant's Name, Address, and Telephone Number Prime Source, LLC, P.O. Box 640, Hockessin, DE 19707		EPA Registration Number/File Symbol 89442-				
Active Ingredient(s) and/or representative test compound(s) Bifenthrin Date November 24, 2014						
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Product Name Bifen 7.9SC Select						
NOTE: If your product is a 100% repackaging of another purchased EPA-register submit this form. You must submit the Formulator's Exemption Statement (EPA Formulator's Exemption Statement (EPA Formulator)						
I am responding to a Data-Call-In Notice, and have included with this form a be used for this purpose).	a list of comp	panies sent offers of compensation (the Data Matrix form should				
SECTION I: METHOD OF DATA SUP	PORT (Chec	ck one method only)				
I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	N S	am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).				
SECTION II: GENERAL	OFFER TO	PAY				
I hereby offer and agree to pay compensation, to other persons, with regard to						
I certify that this application for registration, this form for reregistration, or t application for registration, the form for reregistration, or the Data-Call-In response. I indicated in Section I, this application is supported by all data in the Agency's files the substantially similar product, or one or more of the ingredients in this product; and (2) requirements in effect on the date of approval of this application if the application sou uses.	In addition, if at (1) concer) is a type of	f the cite-all option or cite-all option under the selective method is m the properties or effects of this product or an identical or data that would be required to be submitted under the data				
I certify that for each exclusive use study cited in support of this registration the written permission of the original data submitter to cite that study.	n or reregistr	ration, that I am the original data submitter or that I have obtained				
I certify that for each study cited in support of this registration or reregistral submitter; (b) I have obtained the permission of the original data submitter to use the compensation have expired for the study; (d) the study is in the public literature; or (e offered (I) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3 amount and terms of compensation, if any, to be paid for the use of the study.	study in sup) I have notif	poort of this application; (c) all periods of eligibility for fied in writing the company that submitted the study and have				
I certify that in all instances where an offer of compensation is required, co accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will evidence to the Agency upon request, I understand that the Agency may initiate action FIFRA.	be submitte	d to the Agency upon request. Should I fail to produce such				
I certify that the statements I have made on this form and all attache knowingly false or misleading statement may be punishable by fine or impris-						
Signature Charle Wagne	Date Nov. 24,	Typed or Printed Name and Title Cheryl Wagner, Agent for Prime Source LLC				

EPA Form 8570-34 (12-2003) Electronic and Paper versions available. Submit only Paper version.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

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DATA MATRIX Date: November 24, 2014 EPA Reg No./ File Symbol: 89442 Applicant's/Registrant's Name and Address: Prime Source LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707 Ingredient: Bifenthrin

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
PRODUCT SPECIFIC					
830.1550, 830.1600, 830.1620, 830.1650, 830.1670,	Product Identity, Composition/Description of Materials used to Produce the Product/Description of Formulation Process/Discussion of Formation of Impurities	46116201	Control Solutions, Inc.	PER	
830.1700	Preliminary Analysis	46116201	Control Solutions, Inc.	PER	
830.1750	Certification of Limits		Prime Source LLC	OWN	1
830.1800	Enforcement Analytical Method	46116201	Control Solutions, Inc.	PER	1
830.6302	Color	46116201	Control Solutions, Inc.	PER	
830.6303	Physical State	46116201	Control Solutions, Inc.	PER	
830.6304	Odor	46116201	Control Solutions, Inc.	PER	
830.6314	Oxidation/Reduction		Prime Source, LLC	WAI	
830.6315	Flammability		Prime Source, LLC	WAI	
830.6316	Explodability		Prime Source, LLC	WAI	
830.6317	Storage Stability	46116201	Control Solutions, Inc.	PER	
830.6319	Miscibility		Prime Source, LLC	WAI	
830.6320	Corrosion Characteristics	46116201	Control Solutions, Inc.	PER	
830.6321	Dielectric Breakdown		Prime Source, LLC	WAI	
830.7000	pH	46116201	Control Solutions, Inc.	PER	16.
830.7100	Viscosity	46116201	Control Solutions, Inc.	PER	
830.7220	Boiling Point	46116201	Control Solutions, Inc.	PER	
830,7300	Density/Relative Density • • • • • • • • • • • • • • • • • • •	46116201	Control Solutions, Inc.	PER	
870.1100	Acute Oral Toxicity	41413602	FMC Corp.	OLD	
870.1200	Acute Dermal Toxicity	41413603	FMC Corp.	OLD	

Signature Cherry Words	Name and Title Cheryl Wagner, Agent for Prime Source LLC	Date November 24, 2014



Ingredient: Bifenthrin

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

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Date: November 24, 2014 EPA Reg No./ File Symbol: 89442 Applicant's/Registrant's Name and Address: Prime Source LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707 Product: Bifen 7.9SC Select

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.1300	Acute Inhalation Toxicity	41413604	FMC Corp.	OLD	
870.2400	Primary Eye Irritation	41413605	FMC Corp.	OLD	
870.2500	Primary Dermal Irritation	41413606	FMC Corp.	OLD	7
870.2600	Dermal Sensitization	Cite All	Nufarm Americas, Inc., Morrisville, NC	PAY	
810.3600	Product Performance, Structural Treatments	2000	The Scotts Company, Marysville, OH	PAY	
		FMC Corp., Philadelphia, PA	PAY		
		Bayer Environmental Science, Research Triangle Park, NC	PAY		
		BASF Corporation, Research Triangle Park,NC	PAY		
		Lebanon Seaboard Corp., Lebanon,PA	PAY		
		McLaughlin Gormley King Company, Minneapolis, MN	PAY		
		Winfield Solutions, Inc., St. Paul,MN	PAY		
		Sergant's Pet Care Products, Omaha,NE	PAY		
		Aceto Agricultural Chemicals Corp., Fort Washington, NY	PAY		
		S. C. Johnson & Son, Inc., Racine, WI	PAY		
		Amvac Chemical Corp., Newport Beach, CA	PAY	1	
		Nippon Soda Co. Ltd., New York, NY	PAY		
		Atex, Inc., Valdosta, GA	PAY		
		Osmose Utilities Services, Inc., Tyrone, GA	PAY		
		Chemsico, St.Louis, MO	PAY		
		Lesco, Inc., Cleveland, OH	PAY		
			Makhteshim Chemical Works, Ltd., Raleigh, NC	PAY	
			Loveland Products, Greeley, CO	PAY	
			Ensystex II, Inc., Gig Harbor, WA	PAY	
			Albaugh, Inc., Valdosta, GA	PAY	

Signature Cherch Wagner	Name and Title Cheryl Wagner, Agent for Prime Source LLC Date November 24, 2014	
and mording	Cheryl Wagner, Agent for Prime Source LLC	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W.

WASHINGTON, D.C. 20460

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DATA MATRIX Date: November 24, 2014 EPA Reg No./ File Symbol: 89442 Applicant's/Registrant's Name and Address: Prime Source LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707 Ingredient: Bifenthrin

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Tacoma Ag LLC, Brookfield, CT	PAY	
			Bifenthrin Task Force Steering Committee, Washington, DC	PAY	
			Vive Crop Protection, Inc., East Lansing, MI	PAY	
			Valent USA Corp., Walnut Creek, CA	PAY	
			Pyrethroid Working Group, Washington, DC	PAY	
			MakhteshimAgan of North America, Inc., Raleigh, NC	PAY	
			Arysta Lifescience North America, LLC, Cary, NC	PAY	
			Liberty Crop Protection LLC, Loveland, CO	PAY	
			Bengal Products, Inc., Baton Rouge, LA	PAY	
	19		United Phosphorus, Inc., King of Prussia, PA	PAY	

Footnotes:

- 1) Certification of Limits is provided in the Confidential Statement of Formula EPA form 8574-4
- 2) 830.6314: Oxidation/Reduction: Bifen 7.9SC Select does not contain oxidizing agents; therefore, a waiver is requested.
- 3) 830.6315: Flammability: Bifen 7.9SC does not contain combustible liquids; therefore, a waiver is requested.
- 4) 830.6316: Explodabilty: Bifen 7.9SC does not contain explosive properties; therefore, a waiver is requested.
- 5) 830.6319: Miscibility: Bifen 7.9SC is not an emulsifiable liquid and is not diluted with petroleum solvents; therefore, a waiver is requested.
- 6) 830.6320: Corrosion Characteristics:
- 7) 830.6321: Dielectric Breakdown Voltage: Bifen 7.9SC is not used around electrical equipment; therefore, a waiver is requested.

Signature A	Name and Title	Date
Though Wordson	Cheryl Wagner, Agent for Prime Source LLC	November 24, 2014

Certification with Respect to Label Integrity

version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL					
EPA Registration #	Date Submitted to EPA	Electronic file name			
89442	November 24, 2014	89442-xxxxx.20141124.V1.pdf			

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

Signature Date

Cheryl Wagner Name (typed)

Agent for Prime Source, LLC Title

Prime Source, LLC. 4609 E. Boonville-New Harmony Road, Evansville, IN 47725

U.S. Environmental Protection Agency Office of Pesticide Programs (7505P) One Potomac Yard 2777 South Crystal Drive Arlington, VA 22202

State Pesticide Product Regulatory Agencies in the United States

Re: Designation of Agent for: Prime Source, LLC,

Dear Sir or Madam:

This letter serves as notification that Prime Source, LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding all state and federal regulatory matters relative to products that Prime Source, LLC will register with US EPA and state regulatory authorities. Prime Source, LLC hereby authorities EPA and state regulatory authorities to contact any of the following individuals within WRA, Inc.:

EPA Contacts (Any of the following individuals may be contacted by EPA on our behalf)

James M. Wagner
Managing Director
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7290
Fax: (302) 635-7295
Email: james@wagnerreg.com

Cheryl R. Wagner
President
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7289
Fax: (302) 635-7295
Email: Cheryl@wagnerreg.com

Lori Kohler
Regulatory Associate
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7281
Fax: (302) 635-7295
Email: lori@wagnerreg.com

State Contacts (Any of the following individuals may be contacted by state regulatory authorities on our behalf)

Barbarette Young-Henry Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin. DE 19707 Telephone: (302) 635-7279 Fax: (302) 635-7295 Email: Barbarette@wagnerreg.com Cheryl Wagner
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7289
Fax: (302) 635-7295
Email: Cheryl@wagnerreg.com

Authorization to contact these staff members within WRA, Inc remains in effect until such time that Prime Source, LLC provides notification in writing of any changes.

Respectfully submitted,

Keith Montgomery Sales Manager



September 10th, 2015



Document Processing Desk
ATTN: Richard Gebken (PM 10)
Registration Division (7505P)
U.S. Environmental Protection Agency
Office of Pesticide Programs
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202

PW3

Re: Bifen 7.9SC Select ABN: Bifen 7.9F Select, EPA Registration No. 89442-23 - Final Print

Dear Mr. Gebken:

Wagner Regulatory Associates, Inc. respectfully submits the enclosed final print label for the subject product as requested in the EPA letter dated August 19th, 2015.

If you have any questions about this submission please contact the undersigned at (302) 635-7289 or cheryl@wagnerreg.com.

Respectfully submitted,

Cheryl Wagner

Agent for Prime Source LLC

Enclosure

Prime Source, LLC. 4609 E. Boonville-New Harmony Road, Evansville, IN 47725

U.S. Environmental Protection Agency Office of Pesticide Programs (7505P) One Potomac Yard 2777 South Crystal Drive Artington, VA 22202

State Pesticide Product Regulatory Agencies in the United States

Re: Designation of Agent for: Prime Source, LLC,

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EPA Contacts (Any of the following individuals may be contacted by EPA on our behalf)

James M. Wagner
Managing Director
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7290
Fax: (302) 635-7295
Email: james@wagnerreg.com

Cheryl R. Wagner
President
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7289
Fax: (302) 635-7295
Email: Cheryl@wagnerreg.com

Lori Kohler
Regulatory Associate
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7281
Fax: (302) 635-7295
Email: lori@wagnerreg.com

State Contacts (Any of the following individuals may be contacted by state regulatory authorities on our behalf)

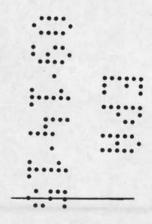
Barbarette Young-Henry
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin. DE 19707
Telephone: (302) 635-7279
Fax: (302) 635-7295
Email: Barbarette@wagnerreg.com

Cheryl Wagner
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7289
Fax: (302) 635-7295
Email: Cheryl@wagnerreg.com

Authorization to contact these staff members within WRA, Inc remains in effect until such time that Prime Source, LLC provides notification in writing of any changes.

Respectfully submitted

Keith Montgomery Sales Manager



Please read instructions on rever	se before cor 'ng form	n.		Form Appr	OMB No.	2070-0060. Approval expires 05-31-98		
⊕EPA ■	United Invironmental Pi Washington	rotection	SECTION SECTION	~	.egistra Amendn Other			
	Appli	cation fo	r Pesticide	- Sectio	n I			
1. Company/Product Number			2. EPA Proc			Proposed Classification		
89442-23			Richard Geb	ken				
	Company/Product (Name)					X None Restricted		
Prime Source LLC /			25	25				
Bifen 7.9SC Select ABN: Bifer	10,1131,131313171							
5. Name and Address of Applicant (Include Zip Code) Prime Source, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 Check if this is a new address			Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name:					
		Se	ection - II					
Amendment - Explain be Resubmission in respon Notification - Explain bel Explanation: Use additional	se to Agency letter dated ow.		Agen Me T	cy letter date oo" Applicat - Explain be	tion.	to August 19 th , 2015		
		Se	ction - III					
1. Material This Product Wil	I Be Packaged In:				9-1			
Child-Resistant Packaging Yes* No * Certification must be submitted	Unit Packaging Yes X No If "Yes" Unit Packaging wgt.	No. per	Water Soluble F Yes X No If "Yes" Package wgt	No. per container	2. Type of X	Container Metal Plastic Glass Paper Other (Specify) HDPE lined bags		
Location of Net Contents Ir	nformation	4. Size(s)	Retail Container	15	. Location of	Label Directions		
	ntainer	1, 2.5, 5 ga						
6. Manner in Which Label is A	Affixed to Product	X Pa	thograph aper glued enciled		Otheradh	nesive backed label		
		Se	ction - IV			• • • • • • • • • • • • • • • • • • • •		
	the same of the sa		of individual to	be contacte		ary, to process this application.)		
Name Cheryl Wagner	Title Ager		Source, LLC			No. (Include Area-Code) 7289 Cheryl@wagnerreg.com		
I certify that the statements I have I acknowledge that any knowingle both under applicable law.	Certific we made on this form and by false or misleading stat	cation all attachmen ement may be	its thereto are true		nd complete.	6. Date Application Received (Stamped)		
2. Signature & Wo	-gre	3. Title Agent for I	Prime Source, L	LC.		······		
4. Typed Name		5. Date						
			er 10 th , 2015	10 th , 2015				



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

August 19, 2015

Cheryl Wagner
Prime Source, LLC
c/o Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707

Subject:

Label Amendment -Additional Directions for Use and Pests

Product Name: BIFEN 7.9SC SELECT EPA Registration Number: 89442-23 Application Date: May 12, 2015 Decision Number: 505098

Dear Mrs. Wagner:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

Page 2 of 2 EPA Reg. No. 89442-23 Decision No. 505098

with FIFRA section 6. If you have any questions, please contact Maggie Rudick by phone at 703-347-0257, or via email at rudick.maggie@epa.gov.

Sincerely,

Kable Bo Davis, Product Manager 3 Invertebrate and Vertebrate Branch 1 Registration Division (7505P) Office of Pesticide Programs

Enclosure

Rudick, Maggie

From: Sent: Cheryl Wagner <cheryl@wagnerreg.com> Tuesday, August 11, 2015 4:58 PM

To:

Rudick, Maggie

Subject:

RE: Label Revisions - EPA reg # 89442-23

Attachments:

89442-00023.20150512.V2.clean.pdf; 89442-00023.20150512.V2.highlighted.pdf

Follow Up Flag: Flag Status:

Follow up Flagged

Hi Maggie,

This product is intended to be used by commercial applicators only in residential areas—it is not sold to homeowners.

Attached are clean and highlighted versions of the revised label.

Regards,

Cheryl Wagner

Wagner Regulatory Associates, Inc.

Telephone: (302) 635-7289 Fax: (302) 635-7295

From: Rudick, Maggie [mailto:Rudick.Maggie@epa.gov]

Sent: Tuesday, August 11, 2015 3:42 PM

To: Cheryl Wagner

Cc: IVB1

Subject: Label Revisions - EPA reg # 89442-23

Cheryl -

We have reviewed your 5/12/15 submitted label amendment for EPA Reg # 89442-23 and are requesting some revisions to your proposed label. They are highlighted in the attached draft label. To summarize the revisions:

- Please clarify intended user. If this product is intended to be used by or sold to homeowners, we will need a
 certification that this product is being sold in a child resistant package.
- Precautionary language should remain as it was on your original label since product specific data drives this language.
- 3. Revisions to Environmental hazards:
 - a. Add Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other public waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage plant authority. For guidance contact your State Water Board or Regional Office of the EPA.
 - b. Change "visiting" the treatment area to "foraging"...
- 4. Remove "General" in General Use Restrictions, General surface spray, General application instructions, etc.
- 5. Remove distributors restriction.
- 6. Remove any reference to greenhouses or nurseries

- 7. Revise advisory statements that need to be made enforceable such as "Bife....may not be used in voids insulated with rigid foam insulation."
- 8. When instructing the user to use a higher rate, clarify the intention to use a higher listed rate/volume/spray/application
- 9. Add header to table on page 18.

Please let me know if you have any further questions. Once these revisions are made, you can email a revised label back to me.

Thank you,

Maggie Rudick
U. S. Environmental Protection Agency
Office of Pesticides Program
Registration Division; Invertebrate & Vertebrate Branch I
(703) 347-0257
Rudick.Maggie@epa.gov

FEDERAL EXPRESS

May 12, 2015

Document Processing Desk (AMEND) ATTN: Kable Bo Davis (PM 3) Registration Division (7505P) U.S. Environmental Protection Agency Office of Pesticide Programs One Potomac Yard 2777 South Crystal Drive Arlington, Virginia 22202 WRA

Wagner Regulatory Associates, Inc. P.O. Box 640 7217 Lancaster Pike, Suite A Hockessin, Delaware 19707

Re: Bifen 7.9SC Select, ABN Bifen 7.9F Select, EPA Reg. No. 89442-23

Dear Mr. Davis:

Wagner Regulatory Associates, Inc., as agent for Prime Source LLC, is submitting an amended label for the above referenced product to include directions for use adding termiticide uses, crane flies to the lists of pests on lawns, directions for use on outside surfaces & around buildings, fire ants and hornets to the list of pests, and directions for use on livestock & poultry house structures.

This label has been revised to "me-too" Bifenthrin TC Insecticide/Termiticide, EPA Registration Number 53883-118. In support of this amendment, enclosed are the following documents:

- Letter from Prime Source LLC, appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Registration (8570-1)
- Formulator's Exemption Statement (8570-27)
- Data Matrix, EPA internal and public copies (8570-35)
- Draft labeling, 2 copies (one clean and one highlighted)
- Statement with Respect to Label Integrity
- · A copy of the EPA approved label for EPA Reg. No. 66222-192

If you have any questions about this submission please contact the undersigned at cheryl@wagnerreg.com.	t (302) 635-7289 or
cheryl@wagnerreg.com.	•
Respectfully submitted,	
Cheryl Wagner	
Cheryl Wagner	•
Agent for Prime Source LLC	·····
Enclosures	-:.*1

0318

Prime Source, LLC. 4609 E. Boonville-New Harmony Road, Evansville, IN 47725

U.S. Environmental Protection Agency Office of Pesticide Programs (7505P) One Potomac Yard 2777 South Crystal Drive Artington, VA 22202

State Pesticide Product Regulatory Agencies in the United States

Re: Designation of Agent for: Prime Source, LLC,

Dear Sir or Madam:

This letter serves as notification that Prime Source, LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding all state and federal regulatory matters relative to products that Prime Source, LLC will register with US EPA and state regulatory authorities. Prime Source, LLC hereby authorizes EPA and state regulatory authorities to contact any of the following individuals within WRA, Inc.:

EPA Contacts (Any of the following individuals may be contacted by EPA on our behalf)

James M. Wagner
Managing Director
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7290
Fax: (302) 635-7295
Email: james@wagnerreg.com

Cheryl R. Wagner
President
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7289
Fax: (302) 635-7295
Email: Cheryl@wagnerreg.com

Lori Kohler
Regulatory Associate
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7281
Fax: (302) 635-7295
Email: lori@wagnerreg.com

State Contacts (Any of the following individuals may be contacted by state regulatory authorities on our behalf)

Barbarette Young-Henry Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin. DE 19707 Telephone: (302) 635-7279 Fax: (302) 635-7295 Email: Barbarette@wagnerreg.com Cheryl Wagner
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7289
Fax: (302) 635-7295
Email: Cheryl@wagnerreg.com

Authorization to contact these staff members within WRA, Inc remains in effect until such time that Prime Source, LLC provides notification in writing of any changes.

Respectfully submitted,

Keith Montgomery Sales Manager

SEPA Environmenta	nited States al Protection Agency ngton, DC 20460	X gistrat Amendm Other	
Α	pplication for Pesticide -	Section I	
1. Company/Product Number 89442-23	EPA Production Kable Bo Davi	24.20.00.00.00	Proposed Classification
4. Company/Product (Name)	PM#		X None Restricted
Prime Source LLC/Bifen 7.9SC Select	3		The Treatment
5. Name and Address of Applicant (Include Zij Prime Source, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 Check if this is a new address.	(b)(l), my prod to: EPA Reg. No. Product Name	uct is similar or identica	e with FIFRA Section 3(c)(3) al in composition and labeling
	Section - II		
Amendment - Explain below. Resubmission in response to Agency letter Notification - Explain below.	dated Final principle Agency	inted labels in response to letter dated o" Application. Explain below.	D #505098
1. Material This Product Will Be Packaged I Child-Resistant Packaging Yes* X No If "Yes"	Water Soluble Pa Yes X No No. per If "Yes"	ckaging 2. Type of X	Container Metal Plastic Glass
* Certification must Unit Packaging v be submitted	vgt. container Package wgt	container	Paper Other (Specify) HDPE lined bags
Location of Net Contents Information X Label Container	Size(s) Retail Container 1, 2.5, 5 gallons	X On La	Label Directions abel abeling accompanying product
6. Manner in Which Label is Affixed to Produc	Lithograph X Paper glued Stenciled	Otheradh	esive backed label
	Section - IV		
Contact Point (Complete items directly below Name Cheryl Wagner	w for identification of individual to be Title Agent for Prime Source, LLC	Telepho (302) 63	ne No. (Include Area Code)
I certify that the statements I have made on this for I acknowledge that any knowingly false or misleading both under applicable law.	ng statement may be punishable by fine		6. Date Application Received (Stamped)
2. Signature	3. Title Agent for Prime Source, LL0	C.	
4. Typed Name Cheryl Wagner	5. Date May 12, 2015		

This is a reproduction of EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete.

Product ingredient source information may be entitled to confidential treatment

Form approved. OMB No. 2070-0060, 2070-0057, 2070-0107, 2070-0122, 2070-0164.



United States

Environmental Protection Agency Washington, DC 20460

Formulator's Exemption Statement

(40 CFR 152.85)

Applicant's Name and Address

Prime Source LLC

c/o Wagner Regulatory Associates, Inc.

P.O. Box 640

Hockessin, DE 19707

EPA File Symbol/Registration Number 89442-23

Product Name

Bifen 7.9SC Select

Date of Confidential Statement of Formula (EPA Form 8570-4)

04/16/2015

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Bifenthrin

- (2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).
- (3) Indicate by checking (A) or (B) below which paragraph applies:
- (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement.

 That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

- (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.
- (4) The following active ingredients in this product qualify for the formulator's exemption.

Product Name	Registra	tions Nueraleon	
	Date 05/12/2015	•• •	
	nd Title Vagner, Agent	Vagner, Agent ■ 05/12/2015	nd Title Date 05/12/2015

Copy 1 – EPA Copy 2 - Applicant copy



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reading the instruction and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington DC 20460. Do not send the form to this address.

Date: May 12, 2015 EPA Reg No./ File Symbol: 89442-23 Applicant's/Registrant's Name and Address: Prime Source LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707 Ingredient: Bifenthrin

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
PRODUCT SPECIFIC					
830.1550, 830.1600, 830.1620, 830.1650, 830.1670,	Product Identity, Composition/Description of Materials used to Produce the Product/Description of Formulation Process/Discussion of Formation of Impurities	46116201	Control Solutions, Inc.	PER	
830.1700	Preliminary Analysis	46116201	Control Solutions, Inc.	PER	
830.1750	Certification of Limits		Prime Source LLC	OWN	1
830.1800	Enforcement Analytical Method	46116201	Control Solutions, Inc.	PER	
830.6302	Color	46116201	Control Solutions, Inc.	PER	
830.6303	Physical State	46116201	Control Solutions, Inc.	PER	
830.6304	Odor	46116201	Control Solutions, Inc.	PER	
830.6314	Oxidation/Reduction		Prime Source, LLC	WAI	
830.6315	Flammability		Prime Source, LLC	WAI	
830.6316	Explodability		Prime Source, LLC	WAI	
830.6317	Storage Stability	46116201	Control Solutions, Inc.	PER	
830.6319	Miscibility		Prime Source, LLC	WAI	
830.6320	Corrosion Characteristics	46116201	Control Solutions, Inc.	PER	
830.6321	Dielectric Breakdown		Prime Source, LLC	WAI	
830.7000	pH	46116201	Control Solutions, Inc.	PER	
830.7100	Viscosity	46116201	Control Solutions, Inc.	PER	
830.7220	Boiling Point	46116201	Control Solutions, Inc.	PER	
830.7300	Density/Relative Density	46116201	Control Solutions, Inc.	PER	
870.1100	Acute Oral Toxicity	41413602	FMC Corp.	OLD	
870.1200	Achte Dermal Toxicity	41413603	FMC Corp.	OLD	

11 1"		
Signature Cheul Wagner	Name and Title Cheryl Wagner, Agent for Prime Source LLC	Date May 12, 2015



Ingredient: Bifenthrin

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

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DATA MATRIX Date: May 12, 2015 EPA Reg No./ File Symbol: 89442-23 Page 2 of 3 Applicant's/Registrant's Name and Address: Prime Source LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707 Product: Bifen 7.9SC Select

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.1300	Acute Inhalation Toxicity	41413604	FMC Corp.	OLD	
870.2400	Primary Eye Irritation	41413605	FMC Corp.	OLD	
870.2500	Primary Dermal Irritation	41413606	FMC Corp.	OLD	
870.2600	Dermal Sensitization	Cite All	Nufarm Americas, Inc., Morrisville, NC	PAY	
810.3600	Product Performance, Structural Treatments		The Scotts Company, Marysville, OH	PAY	
			FMC Corp., Philadelphia, PA	PAY	
			Bayer Environmental Science, Research Triangle Park, NC	PAY	
			BASF Corporation, Research Triangle Park,NC	PAY	
			Lebanon Seaboard Corp., Lebanon,PA	PAY	
			McLaughlin Gormley King Company, Minneapolis, MN	PAY	
			Winfield Solutions, Inc., St. Paul,MN	PAY	
			Sergant's Pet Care Products, Omaha,NE	PAY	
			Aceto Agricultural Chemicals Corp., Fort Washington, NY	PAY	
			S. C. Johnson & Son, Inc., Racine, WI	PAY	
			Amvac Chemical Corp., Newport Beach, CA	PAY	N
			Nippon Soda Co. Ltd., New York, NY	PAY	1
			Atex, Inc., Valdosta, GA	PAY	
			Osmose Utilities Services, Inc., Tyrone, GA	PAY	
			Chemsico, St.Louis, MO	PAY	
			Lesco, Inc., Cleveland, OH	PAY	
			Makhteshim Chemical Works, Ltd., Raleigh, NC	PAY	
			Loveland Products, Greeley, CO	PAY	
			Ensystex II, Inc., Gig Harbor, WA	PAY	
			Albaugh, Inc., Valdosta, GA	PAY	

Signature Cheux Wagner	Name and Title Cheryl Wagner, Agent for Prime Source LLC	Date May 12, 2015
FDA F 9570 25 (0.07) FD 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	D. Carlotte and Ca	1 1 1 111 (2)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W.

WASHINGTON, D.C. 20460

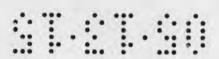
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Date: May 12, 2015 Applicant's/Registrant's Name and Address: Prime Source LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707 Ingredient: Bifenthrin

Guideline Reference Number	Guideline Study Name MRID Number		Submitter	Status	Note
			Tacoma Ag LLC, Brookfield, CT	PAY	
			Bifenthrin Task Force Steering Committee, Washington, DC	PAY	N. E
			Vive Crop Protection, Inc., East Lansing, MI	PAY	
			Valent USA Corp., Walnut Creek, CA	PAY	III.
		Pyrethroid Working Group, Washington, DC	PAY	1	
			MakhteshimAgan of North America, Inc., Raleigh, NC	PAY	
			Arysta Lifescience North America, LLC, Cary, NC	PAY	
			Liberty Crop Protection LLC, Loveland, CO	PAY	1
			Bengal Products, Inc., Baton Rouge, LA	PAY	
			United Phosphorus, Inc., King of Prussia, PA	PAY	

Footnotes:

- 1) Certification of Limits is provided in the Confidential Statement of Formula EPA form 8574-4
- 2) 830.6314: Oxidation/Reduction: Bifen 7.9SC Select does not contain oxidizing agents; therefore, a waiver is requested.
- 3) 830.6315: Flammability: Bifen 7.9SC does not contain combustible liquids; therefore, a waiver is requested.
- 4) 830.6316: Explodabilty: Bifen 7.9SC does not contain explosive properties; therefore, a waiver is requested.
- 5) 830.6319: Miscibility: Bifen 7.9SC is not an emulsifiable liquid and is not diluted with petroleum solvents; therefore, a waiver is requested.
- 6) 830.6320: Corrosion Characteristics:
- 7) 830.6321: Dielectric Breakdown Voltage: Bifen 7.9SC is not used around electrical equipment; therefore, a waiver is requested.



Signature Cheek Woom	Name and Title Cheryl Wagner, Agent for Prime Source LLC	Date May 12, 2015



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

June 22, 2015

Cheryl Wagner
Prime Source LLC
c/o Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707

Subject: CSF Notification per PRN 98-10 – Add Additional Production Facilities to Basic,

Alternate #1, and Alternate #2 CSF Product Name: BIFEN 7.9SC SELECT EPA Registration Number: 89442-23 Application Date: June 10, 2015 Decision Number: 505954

Dear Ms. Wagner:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The CSFs submitted with your application have been stamped "Notification" and placed in our files.

Please note that the record for this product currently contains the following CSFs:

- Basic CSF dated 06/10/2015
- Alternate CSF 1 dated 06/10/2015
- Alternate CSF 2 dated 06/10/2015

Any CSFs other than those listed above are superseded/no longer valid. If you have any questions, you may contact Maggie Rudick at (703) 347-0257 or via email at rudick.maggie@epa.gov.

Sincerely,

Kable Bo Davis, Product Manager 3 Invertebrate & Vertebrate Branch 1 Registration Division (7505P)

Magging Rulick

Office of Pesticide Programs

June 10 March 16th, 2015



Document Processing Desk (NOTIF)
ATTN: Richard Gebken (PM 10)
Registration Division (7505P)
U.S. Environmental Protection Agency
Office of Pesticide Programs
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202

Re: Bifen 7.9SC Select ABN: Bifen 7.9F Select, EPA Reg. No. 89442-23 Notification of Revised Confidential Statement of Formulas

Dear Mr. Gebken:

Wagner Regulatory Associates, Inc., as agent for Prime Source LLC, respectfully notifies the Agency that an additional production facility has been added to Box 2 of the Basic, Alternate 1, and Alternate 2 Confidential Statement of Formulas. These revised CSFs will replace all current EPA approved CSFs dated March 16th, 2015.

In support of this request, the following documents and studies are attached:

- · Letter from Prime Source LLC, appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Registration (8570-1)
- · 2 copies of the revised CSF

Please feel free to contact me via email at cheryl@wagnerreg.com or telephone at (302) 635-7289.

Respectfully submitted,

Cheryl Wagner

Agent for Prime Source LLC

Change & Wagne

Enclosures

Please read instructions on reve	erse before co ng for	m.	F	orm App	OMB No. 2	2070-0060. Approva		
\ -	,				egistrat	ion OPP Iden	tifier Number	
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Company/Product Number		ication f	or Pesticide - 2. EPA Produ			3. Proposed Cl	assification	
89442-23	1		Richard Gebk		31	3. Proposed Ci	assilication	
Company/Product (Name			PM#	OII				
Prime Source LLC /						X None	Restricted	
						1000		
		dol	G Eunodited	Pavious	In conordono	e with FIFRA Section	nn 2/a\/2\	
5. Name and Address of Ap	plicant (metude zip co	ue)	(b)(l), my prod	luct is sim	ilar or identica	il in composition ar	nd labeling	
Prime Source, LLC c/o Wagner Regulatory A	Associates Inc		to: EPA Reg. No.					
P.O. Box 640	tosociatos, irio.					•	::.:	
Hockessin, DE 19707			Product Name	:				
☐ Check	if this is a new addres		Na addison III			***	•	
Amendment - Explain b	pelow	- 5	Section - II	rinted labels	s in response to	• • •	*****	
			Agency	letter date	d			
	nse to Agency letter dated			o" Applicati		• • • • • • • • • • • • • • • • • • • •		
Notification - Explain be	alow.		Other -	Explain be	low.	• • • •		
FIFRA and I may be subject to e	inforcement action and pe		ection - III	of FIFRA.				
1. Material This Product W	the same of the sa							
Child-Resistant Packaging Yes*	Unit Packaging Yes		Water Soluble Pa	ckaging	2. Type of 0	Container Metal		
X No	X No		X No		X	Plastic		
	If "Yes"	No. per	If "Yes"	No. per	1	Glass		
* Certification must	Unit Packaging wgt.	container	Package wgt	container		Paper		
be submitted						Other (Specify) HDPE lined bag		
Location of Net Contents	Information	4 Size/s) Retail Container	15	Location of I	abel Directions		
	ontainer	1, 2.5, 5 g			X On La			
	11000100	1,20,00	,		On Labeling accompanying product			
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6. Manner in Which Label is	Allixed to Product		Lithograph Paper glued		Otheradhe	esive backed label_		
			Stenciled					
		S	ection - IV					
1. Contact Point (Complete	items directly below for	identification	on of individual to be	e contacte				
Name Cheryl Wagner	Title		e Source, LLC			No. (Include Area C 289 Cheryl@wagne		
Cheryi wagner		cation	S Cource, LLC		(302) 030-11	6. Date Application		
I certify that the statements I had acknowledge that any knowing both under applicable law.						Received (Stamp	ned)	
The state of the s	00.000	3. Title				(2.07)		
2. Signature RW	1,000	Agent fo	r Prime Source, LL0	C.				
4. Typed Name		5. Date						
Cheryl Wagner								

This is a reproduction of EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete.

Prime Source, LLC. 4609 E. Boonville-New Harmony Road, Evansville, IN 47725

U.S. Environmental Protection Agency Office of Pesticide Programs (7505P) One Potomac Yard 2777 South Crystal Drive Artington, VA 22202

State Pesticide Product Regulatory Agencies in the United States

Re: Designation of Agent for: Prime Source, LLC,

Dear Sir or Madam:

This letter serves as notification that Prime Source, LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding all state and federal regulatory matters relative to products that Prime Source, LLC will register with US EPA and state regulatory authorities. Prime Source, LLC hereby authorizes EPA and state regulatory authorities to contact any of ... the following individuals within WRA, Inc.:

EPA Contacts (Any of the following individuals may be contacted by EPA on our behalf)

James M. Wagner
Managing Director
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7290
Fax: (302) 635-7295
Email: james@wagnerreg.com

Cheryl R. Wagner
President
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7289
Fax: (302) 635-7295
Email: Cheryl@wagnerreg.com

Lori Kohler
Regulatory Associate
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7281
Fax: (302) 635-7295
Email: lori@wagnerreg.com

State Contacts (Any of the following individuals may be contacted by state regulatory authorities on our behalf)

Barbarette Young-Henry Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 Telephone: (302) 635-7279 Fax: (302) 635-7295 Email: Barbarette@wagnerreg.com Cheryl Wagner
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7289
Fax: (302) 635-7295
Email: Cheryl@wagnerreg.com

Authorization to contact these staff members within WRA, Inc remains in effect until such time that Prime Source, LLC provides notification in writing of any changes.

Respectfully submitted.

Keith Montgomery Sales Manager



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

April 30, 2015

Cheryl Wagner Prime Source LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707

Subject:

Notification per PRN 98-10 - Remove NY State Specific Language on First Page

Product Name: BIFEN 7.9SC SELECT EPA Registration Number: 89442-23 Application Date: April 9, 2015

Decision Number: 503458

Dear Ms. Wagner:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, you may contact Maggie Rudick at (703) 347-0257 or via email at rudick.maggie@epa.gov.

Sincerely,

Kable Bo Davis, Product Manager 3 Invertebrate & Vertebrate Branch 1 Registration Division (7505P)

Magging Reliek

Office of Pesticide Programs

April 9th, 2015



Wagner Regulatory Associates, Inc. P.O. Box 640 7217 Lancaster Pike, Suite A Hockessin, Delaware 19707

Document Processing Desk (NOTIF) ATTN: Mindy Ondish (PM 25) Registration Division (7505P) U.S. Environmental Protection Agency Office of Pesticide Programs One Potomac Yard 2777 South Crystal Drive Arlington, Virginia 22202

Re: Bifen 7.9SC Select ABN: Bifen 7.9F Select, EPA Registration No. 89442-23 - Notification

Dear Ms. Ondish:

Wagner Regulatory Associates, Inc., as agent for Prime Source LLC, is submitting a notification to remove the New York state specific language off the first page. No other changes have been made to the label.

In support of this notification, the following documents are attached:

- · Letter from Prime Source, LLC appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Registration (8570-1)
- · A copy of the label

Please feel free to contact me via email at cheryl@wagnerreg.com or telephone at (302) 635-7289

Respectfully submitted,

Cheryl Wagner

Agent for Prime Source LLC

Charle & Wagne

Prime Source, LLC. 4609 E. Boonville-New Harmony Road, Evansville, IN 47725

U.S. Environmental Protection Agency Office of Pesticide Programs (7505P) One Potomac Yard 2777 South Crystal Drive Arlington, VA 22202

State Pesticide Product Regulatory Agencies in the United States

Re: Designation of Agent for: Prime Source, LLC,

Dear Sir or Madam:

This letter serves as notification that Prime Source, LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding all state and federal regulatory matters relative to products that Prime Source, LLC will register with US EPA and state regulatory authorities. Prime Source, LLC hereby authorizes EPA and state regulatory authorities to contact any of the following individuals within WRA, Inc.:

EPA Contacts (Any of the following individuals may be contacted by EPA on our behalf)

James M. Wagner
Managing Director
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7290
Fax: (302) 635-7295
Email: james@wagnerreg.com

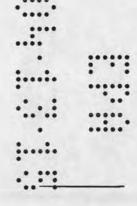
Cheryl R. Wagner
President
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7289
Fax: (302) 635-7295
Email: Cheryl@wagnerreg.com

Lori Kohler
Regulatory Associate
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7281
Fax: (302) 635-7295
Email: lori@wagnerreg.com

State Contacts (Any of the following individuals may be contacted by state regulatory authorities on our behalf)

Barbarette Young-Henry
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin. DE 19707
Telephone: (302) 635-7279
Fax: (302) 635-7295
Email: Barbarette@wagnerreg.com

Cheryl Wagner
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707
Telephone: (302) 635-7289
Fax: (302) 635-7295
Email: Cheryl@wagnerreg.com

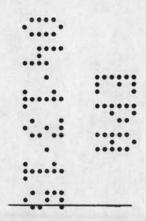


Authorization to contact these staff members within WRA, Inc remains in effect until such time that Prime Source, LLC provides notification in writing of any changes.

Respectfully submitted,

HALL RODGES EIB

Keith Montgomery Sales Manager



Please read instructions on revers	se before coi ng fori	m.		Form Appro		OMB No.	2070-00	60. Approval expires 05-31-98	
	44-90-0				Re	gistra	tion	OPP Identifier Number	
SEPA E	SEPA Environmental Protection Agency				An	nendm	ent		
-		DC 20460		1	Ot	her			
	Appl	ication fo	r Pesticide	- Sectio					
1. Company/Product Number			2. EPA Prod				3. F	Proposed Classification	
89442-23			Mindy Ondis	h			1		
4. Company/Product (Name)		day and S	PM#					None Restricted	
Prime Source LLC / Bifen 7.9SC Select ABN: Bifen 7.9F Select			25						
5. Name and Address of App Prime Source, LLC c/o Wagner Regulatory As P.O. Box 640 Hockessin, DE 19707 Check in	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name:								
		Se	ction - II						
Amendment - Explain be	low.			printed labe		sponse to)		
Resubmission in respons	se to Agency letter dated	1		oo" Applicat			-		
Notification - Explain belo	ow.		Other	- Explain be	elow.				
Explanation: Use additional Notification to remove the N This notification is consistent with labeling or the confidential statem to EPA. I further understand that i FIFRA and I may be subject to en	ew York state specif the provisions of PR No ent of formula of this pro f this notification is not co	fic language tice 98-10 and duct. I understa onsistent with t enalties under s	off the fist pag EPA regulations a and that it is a viol he terms of PR No ections 12 and 14	e. at 40 CFR 15 lation of 18 to otice 98-10 a	J.S.C.	Sec. 100	1 to willf	ully make any false statement	
4 Metadal This Dead at 1861	I De Deekened Inc	56	ction - III				_		
 Material This Product Will Child-Resistant Packaging 	Unit Packaging	Ti	Water Soluble P	ackaging	12.	Type of	Contain	er	
Yes*	Yes		Yes				Metal		
X No	X No		X No			X	Plastic		
	If "Yes"		f "Yes"	No. per			Glass		
* Certification must	Unit Packaging wgt.	container F	Package wgt	container	ntainer		Paper	er	
be submitted							Other	(Specify) HDPE lined bags	
3. Location of Net Contents Ir	formation	4. Size(s) F	Retail Container	5	. Loc	ation of	Label D	Directions	
X Label Con	tainer	1, 2.5, 5 gal	lons		X	On La		accompanying product	
6. Manner in Which Label is A	Affixed to Product	Litt	hograph		Other	adhe	esive ba	acked label	
		X Pa	per glued enciled						
		Sec	ction - IV				-	•	
1. Contact Point (Complete ite	ems directly below for	identification	of individual to	be contacte	-			The second secon	
Name Cheryl Wagner	Title Age	nt for Prime S	Source, LLC					lude Area Code) eryl@wagnerreg.com • •	
I certify that the statements I hav I acknowledge that any knowingl both under applicable law.	Certificate made on this form and y false or misleading state	cation all attachment	ts thereto are true	, accurate a e or impriso	nd con	plete.	6. Dat	e Application ceived (Stamped)	
2. Signature & Wo	que	3. Title Agent for F	Prime Source, LLC.						
4. Typed Name		5. Date							
Cheryl Wagner April 9th, 20			115						



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 1200 Pennsylvania Avenue, N.W. WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the completed form

Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Aven to this address.					
Certification with Respect to C	itation of Data				
Applicant's/Registrant's Name, Address, and Telephone Number Prime Source, LLC, P.O. Box 640, Hockessin, DE 19707		EPA Registration Number/File Symbol 89442-23			
Active Ingredient(s) and/or representative test compound(s) Bifenthrin		Date November 04, 2019			
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial Non-Food Crops	Product Name				
NOTE: If your product is a 100% repackaging of another purchased EPA-registere submit this form. You must submit the Formulator's Exemption Statement (EPA Form		r all the same uses on your label, you do not need to			
I am responding to a Data-Call-In Notice, and have included with this form a be used for this purpose).	list of companies se	nt offers of compensation (the Data Matrix form should			
SECTION I: METHOD OF DATA SUPP	ORT (Check one me	ethod only)			
I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	under the	the selective method of support (or cite-all option selective method), and have included with this form a d list of data requirements (the Data Matrix form must be			
SECTION II: GENERAL O	OFFER TO PAY				
[Required if using the cite-all method or when using the cite-all option under the select	ive method to satisfy	y one or more data requirements]			
I hereby offer and agree to pay compensation, to other persons, with regard to	the approval of this	application, to the extent required by FIFRA.			
SECTION III: CERTI	FICATION				
I certify that this application for registration, this form for reregistration, or th application for registration, the form for reregistration, or the Data-Call-In response. In indicated in Section I, this application is supported by all data in the Agency's files that substantially similar product, or one or more of the ingredients in this product; and (2) i requirements in effect on the date of approval of this application if the application souguses .	addition, if the cite-a (1) concern the pros a type of data that	all option or cite-all option under the selective method is perties or effects of this product or an identical or would be required to be submitted under the data			
I certify that for each exclusive use study cited in support of this registration the written permission of the original data submitter to cite that study.	or reregistration, tha	at I am the original data submitter or that I have obtained			
I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (I) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.					
I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.					
I certify that the statements I have made on this form and all attachment knowingly false or misleading statement may be punishable by fine or imprison					
Signature	Date NOV. 04, 2019	Typed or Printed Name and Title Ogongi Ogongi, Authorized Agent			

Submission ID: RRL-58868							
Registration Review Label Submission Information							
Submission Name	Bifen 7	Bifen 7.9SC Select 89442-23					
Case Number	7402-1						
Case Name	Bifentl	Bifenthrin					
Reason for Submitting	Label	Amend					
Initial Submission	No						
Company Name	PRIME	PRIME SOURCE, A DIVISION OF ALBAUGH LLC					
Company Number	89442	89442					
RRL Documents							
Document Type		Contains CBI?	Document Name	Product Registration Number			
Submission Cover Letter		No	089442-00023.20210222.CoverLetter.pdf				
Form 8570-1 Pesticide Registr Application	ation/Amendmer	nt No	089442-00023.20210222.Bifen 7.9SC Select 8570-1.pdf	89442-23			
Draft Label		No	089442-00023.20210222.DRAFT .pdf	89442-23			
Draft Label		No	089442-00023.20210222.DRAFT Tracked Changes .pdf	89442-23			
Submitter Information							
Submitter	Caroly	n Miter					
Submitted Date	02/23/2	2021					

Registration Review Label Submission

I certify, under penalty of law that the information provided in this document is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Please read instructions on reve	erse before completing f	orm.		Form Appro	oved. OMB No. 207	0-0060. Approval expires 05-31-9		
O EDA	Washington, DC 20460			✓	Registration Amendment Other	OPP Identifier Number		
		lication for	r Pesticide -					
1. Company/Product Number 89442-23	er -		2. EPA Pro Jacqu	oduct Mana uelyn Herri	-	oposed Classification		
4. Company/Product (Name	e)		PM#	PM#				
ABN: Bifen 7.9F Select; ABN ABN: Ike's Farm, Home, Ga	Prime Source, LLC / Bifen 7.9SC Select ABN: Bifen 7.9F Select; ABN: Lawn Pest Killer ABN: Ike's Farm, Home, Garden Lawn Pest Killer			None ☐ Restricted				
 Name and Address of Apprime Source, LLC c/o Wagner Regulatory / P.O. Box 640, Hockessin □ Check it 	(I), my produ	 Expedited Review. In accordance with FIFRA Section 3(c)(3)(b) (I), my product is similar or identical in composition and labeling to: EPA Reg. No.: Product Name: 						
, L		Se	ction - II					
Amendment - Explain below. Resubmission in response to Agency letter dated Notification - Explain below. Explanation: Use additional page(s) if necessary. (For Section I a			Agend	cy letter date Too" Applicat r - Explain be	tion.	igust 03, 2020		
Explanation. Use additions	II page(s) II necessary	/. (FOI Section	I I and Section II.)				
			ction - III					
1. Material This Product W Child-Resistant Packaging Yes* No *Certification must be submitted	Unit Packaging Yes No If "Yes" Unit Packaging wgt.	No. per container	Package wgt c	No. per container	Married Control	c r r (Specify) HDPE lined bags		
3. Location of Net Contents Label Co	Information ontainer		etail Container 1 qt., 1, 2.5, 5 gal	il Container 5. Location of Label Directions t., 1, 2.5, 5 gallons On Label On Labeling accompanying product				
6. Manner in Which Label is	Affixed to Product	☑ Pa	ithograph aper glued tenciled ction - IV	Othe	r			
Contact Point (Complete	items directly below t		533 11 42 3 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	be contacte	ed, if necessary, to	o process this application.)		
Name	Title					Include Area Code)		
Ogongi Ogongi	Ogongi Ogongi Authorized Agent				(302) 239-7369	(ogongi@wagnerreg.com)		
I certify that the statements I complete. I acknowledge that imprisonment or both under app	have made on this for it any knowingly false of				urate and Re	ate Application eceived (Stamped)		
2. Signature		3. Title Authorize	d Agent					
4. Typed Name		5. Date	107					
Ogongi Ogongi January 8, 20			3 2021					

Please read instructions on rever	rse before completing fo	rm.	Fo	orm Appr	oved. OMB	No. 2070-	0060. Approval expires 05-31-9	
	Linitad	States			Registi	ration	OPP Identifier Number	
⊛EPA ∈	^{Onited} nvironmental P		gency		Amend	lment		
VEIA	Washington, DC 20460			✓	Other			
		ication for I	Pesticide - S				•	
1. Company/Product Number			2. EPA Produ	ıct Mana	ager	3. Pro	oosed Classification	
89442-23			Jacque	lyn Herr	ick			
4. Company/Product (Name))		PM#			I	None Restricted	
Prime Source, LLC / Bifen 7.9SC Select ABN: Bifen 7.9F Select; ABN: Lawn Pest Killer ABN: Ike's Farm, Home, Garden Lawn Pest Killer				3				
5. Name and Address of App	olicant <i>(Include Zip Co</i>	ode)					th FIFRA Section 3(c)(3)(b)	
Prime Source, LLC	:-				iar or ident	icai in co	mposition and labeling to:	
c/o Wagner Regulatory A P.O. Box 640, Hockessin	ssociates, inc. , DE 19707		EPA Reg. No.	.:				
	this is a new address		Product Name	e:				
		Sect	ion - II					
Amendment - Explain b	elow.		I √ I	nted labe	els in respon		August 03, 2020	
Resultmission in respon	nse to Agency letter date	d	_	retter dat o" Applica			1ugusi 05, 2020	
Notification - Explain be			_	Explain b				
Explanation: Use additional		(For Section I		<u> Ехріаіі і</u>	elow.			
Explanation. Use additional	page(s) ii liecessaly.	(I OI GEORIOTI I	and Occion II.)					
		Sect	ion - III					
1. Material This Product W	ill Be Packaged In:							
Child-Resistant Packaging	Unit Packaging		ater Soluble		2. Type	of Contai	ner	
□ ∨ _{*-*}		l Pa	ackaging			N 1 - 4 - 1		
∐ Yes*	Yes		☐ Yes ☐			Metal Plastic		
⊻ No	✓ No If "Yes"	No por	_	✓ No				
*Certification must		'	•		Glass			
be submitted	Unit Packaging wgt.	container Pa	ackage wgt con	Paper				
						Other (Specify) HDPE lined bags	
Location of Net Contents I	nformation	4. Size(s) Reta	ail Container		5. Locati	ion of Lal	pel Directions	
☑ Label ☐ Co	ntainer	16 oz., 1 q	:., 1, 2.5, 5 gallons √			On Label		
					Ш	On Labe	ling accompanying product	
6. Manner in Which Label is	Affixed to Product	Litho	ograph 🔲] Othe	er			
			er glued					
		:	nciled					
			ion - IV					
Contact Point (Complete i	tems directly below fo			contact	ed, if nece	ssarv, to	process this application.)	
Name	Title						iclude Area Code)	
Ogongi Ogongi					(302) 239	9-7369 (c	ogongi@wagnerreg.com)	
Certification						6. Date	e Application	
I certify that the statements I have made on this form and all attachm complete. I acknowledge that any knowingly false or misleading stater							eived	
imprisonment or both under appli		misieaung state	ment may be pur	HOBITE	by little of		(Stamped)	
2. Signature		3. Title				1	(
Chundy		Authorized A	Agent					
4. Typed Name		5. Date	-			1		
Ogongi Ogongi		November 2	25 2020					
Ogorigi Ogorigi		MOVELLING 2	.0, 2020			I		

Please read instructions on revers	e before con	npleting for	m.		Fo	rm Appı	roved. OMB	No. 2070-		al expires 05-31
		United	States				Registr	ation	OPP Identif	ier Number
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7-111			DC 20460			√	Other			
		Appli	cation fo	or Pesticide	<u> - S</u>	ectio	n I			
1. Company/Product Number		, тррп	oution io	2. EPA F				3. Prop	osed Classif	ication
89442-23				Jac	cauel	yn Heri	rick			
4. Company/Product (Name)				PM#	- 4	J				
Prime Source, LLC / Bifen 7.99	SC Salast			1 10177		3		$\overline{\mathbf{Q}}$	None	Restricted
ABN: Bifen 7.9F Select; ABN:		Killer				3				
ABN: Ike's Farm, Home, Garde	en Lawn Pe	est Killer								
5. Name and Address of Appli	icant <i>(Inclu</i> e	de Zip Co	de)						h FIFRA Sec mposition and	tion 3(c)(3)(b)
Prime Source, LLC c/o Wagner Regulatory As:	oogiataa In	•		1 ' ' ' '			iiai oi iu c iii	icai iii co	inposition and	a labelling to.
P.O. Box 640, Hockessin,		0.		EPA Reg	. INO	•				
☐ Check if th	is is a new a	ddress		Product N	Name	:				
			Se	ection - II						
Amendment - Explain be	low.			1 1		nted labe etter da	els in respon ted	se to		
Resubmission in respons	e to Agency	letter dated	d	— ·	,	" Applica				
Notification - Explain belo	ow.			— <u> </u>	her - E	xplain b	pelow.			
Explanation: Use additional p		ecessary.	(For Sectio							
CSF Notification – Add Sou	rces of Teo	chnical, U	Jpdate Regi	istrants of tech	nical					
This notification is consistent with the										
confidential statement of formula of t that if this notification is not consisten										
action and penalties under sections 12	2 and 14 of FIF	RA.								
			Se	ection - III						
1. Material This Product Will Child Posistant Posksging	Unit Packa	=		Water Soluble			2 Tuno	of Contoi	nor	
Child-Resistant Packaging	Unit Fack	aging		Packaging	;		2. Type	oi Contai	Hei	
☐ Yes*		Yes		☐ Yes				Metal		
☑ No	√ 1	No		☑ No			$\overline{\checkmark}$	Plastic		
	If "Yes"		No. per	If "Yes"	No.	per	1 🗆	Glass		
*Certification must	Unit Packa	ging wgt.	container	Package wgt	ckage wgt container		I =	Paper		
be submitted		ĺ]		I	Other (Specify) HDP	F lined bags
0 1 (4 0: () 5					<u> </u>		_ miod bago
3. Location of Net Contents In				Retail Container	4 0 5 5 11					
✓ Label ☐ Con	tainer		16 02.,	1 qt., 1, ∠.5, 5 g	t., 1, 2.5, 5 gallons					
					☐ On Labeling accompanying proc			nying product		
C. Mannanin Which Labelia A	ffixed to De	- d., -t			_					
6. Manner in Which Label is A	illixed to Pr	oduci	_	_ithograph	Ш	Oth	er			
			√ F	Paper glued						
				Stenciled						
				ection - IV						
Contact Point (Complete ite	ems directly		dentificatio	on of individual t	to be	contact				
Name		Title					1	,	clude Area C	,
gongi Ogongi Authorized Agent						(302) 239	9-7369 (o	gongi@wagn	erreg.com)	
I contife that the atotomounts I be		Certific			4				e Application	
I certify that the statements I had complete. I acknowledge that a								Rec	eived	
imprisonment or both under applic									(Stampe	ed)
2. Signature 3. Title										
Authorized Ag			ed Agent							
Typed Name			5. Date							
Ogongi Ogongi			Novemb	er 06, 2020						_
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Please read instructions on revers	e before completing for	rm.		Form	n Appr	oved. OMB	No. 2070-	0060. Approval	
	United	States				Registi	ration	OPP Identifie	r Number
ÆEPA En	vironmental P		laencv			Amend	lment		
76171		, DC 20460	-9		√	Other			
	Δnnli	cation for	Pesticide :	- Sec	ctio			l	
1. Company/Product Number	Дррп		2. EPA Pr				3. Pror	osed Classific	ation
89442-23				quelyn		•		0.0.00	
			PM#	queiyii	111011	IOR			
4. Company/Product (Name)	20 0alaat		FIVI#	2			\square	None	Restricted
Prime Source, LLC / Bifen 7.99 ABN: Bifen 7.9F Select	SC Select			3					
ABN: Lawn Pest Killer									
Name and Address of Appli	icant <i>(Include Zip Co</i>	ode)	_					th FIFRA Section	. , . , . ,
Prime Source, LLC			.,,		SIIIIII	iar or ident	icai in co	mposition and	abeling to.
c/o Wagner Regulatory Ass P.O. Box 640	sociales, inc.		EPA Reg.	No.:					
Hockessin, DE 19707			Product Na	ame:					
☐ Check if th	is is a new address	Soc	_l tion - II						
Amendment - Explain be	low	000		l printe	d labe	els in respon	se to		
l <u> </u>			~	ncy lett					
Resubmission in respons		d	_	Too" A	• •				
Notification - Explain belo				er - Exp	olain b	elow.			
Explanation: Use additional page(s) if necessary. (For Section I and Section II.) Label notification to add a descriptor to the first page and correct minor typographical errors. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections.							f this product. I consistent with		
12 and 14 of FIFRA.		•						·	
Material This Product Will	I Po Pookogod Inc	Sec	tion - III						
Child-Resistant Packaging	Unit Packaging	V	Vater Soluble			2. Type	of Contai	ner	
Community deniaging	o.m.r donagg		Packaging			,p=			
☐ Yes*	☐ Yes		☐ Yes				Metal		
☑ No	☑ No		☑ No			$\overline{\mathbf{Q}}$	Plastic		
	If "Yes"	No. per	"Yes"	No. pe	r		Glass		
*Certification must be submitted	Unit Packaging wgt.	container F	ackage wgt	contair	ner		Paper		
be submitted							Other (Specify) HDPE	lined bags
Location of Net Contents In	formation	4. Size(s) Ref	ail Container			5 Locati	on of Lah	oel Directions	
l	tainer	• •	qt., 1, 2.5, 5 ga	allons			On Label		
Label Loll	lainei		1, .,, . 3.						
						Ш	On Labe	ling accompan	ing product
6. Manner in Which Label is A	ffixed to Product	□ Litt	iograph	П	Othe	er .			
			per glued	_	•				
			nciled						
Contact Point (Complete ite	ems directly helow fo		tion - IV	he co	ntacti	ed if nece	ssan, to	nrocess this ar	onlication)
Name	Title	r identification (or individual to	DC 00	maci			clude Area Co	
Katie Woodall Agent for Prime Source, L			, LLC			-	•	twoodall@wag	•
Certification						<u> </u>	. `	e Application	
I certify that the statements I ha	ave made on this forn	n and all attach						eived	
complete. I acknowledge that any knowingly false or misleading statem imprisonment or both under applicable law.				punish	nable	by fine or		(Stamped	۸
2. Signature		3. Title						(Staniped	,
			rime Source, L	LLC					
4. Typed Name		5. Date	204,00, L				ļ		
			010						
Katie Woodall		July 24th, 2	J 19						

⊕EPA ■	nvironment	nited States al Protection ngton, DC 20460	Agency		An	egistration nendment		er Number
			- Dootioido - C	,		her		
1. Company/Product Number		pplication to	Pesticide - S 2. EPA Product			3	. Proposed Class	eification
89442-23				J		3	. Froposed Class	Silication
				elyn He	HICK			
4. Company/Product (Name)			PM#				X None	Restricted
Prime Source, LLC / Bifen 7.9 ABN: Bifen 7.9F Select ABN: Lawn Pest Killer ABN: Ike's Farm, Home, Gard		3						
5. Name and Address of App	licant <i>(Include Zi</i>	p Code)					h FIFRA Section	
Prime Source, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707			(b)(l), my producto: EPA Reg. No. Product Name:	EPA Reg. No.				labeling
☐ Check	if this is a new ac	ldress						
		Se	ction - II					
Amendment - Explain be	elow					sponse to		
Resubmission in respon		dated	Agency is			Septe	ember 27 th , 2018	
_		ualeu	_ =	"Me Too" Application. Other - Explain below.				
Notification - Explain be		· · · · · /F · · · O · · · ti · · ·		xpiain be	elow.			
Explanation: Use additional	page(s) ii necess	sary. (For Section	i and Section II.)					
		Se	ction - III					
1. Material This Product Wi	II Be Packaged	n:						
Child-Resistant Packaging	Unit Packaging	'	Water Soluble Pack	kaging	2.	Type of Cont		
Yes*	Yes		Yes			Met		
X No	X No		X No			X Plas		
	If "Yes"	'		o. per		Gla		
* Certification must	Unit Packaging v	vgt. container l	Package wgt co	ontainer		Pap		
be submitted						Oth	er (Specify) HDP	E lined bags
Location of Net Contents I	nformation	4. Size(s) F	Retail Container	5	i. Loc	ation of Labe	el Directions	
X Label Con	ntainer	` ′	, 1, 2.5, 5 gallons		Х	On Label On Labelir	ng accompanying	product
6. Manner in Which Label is	Affixed to Produc	X Pa	nograph per glued enciled		Other	adhesive	e backed label	
		Sec	ction - IV					
Contact Point (Complete in	tems directly belo	w for identification	of individual to be	contacte				
Name		Title			Tel	ephone No. (Include Area Coo	de)
Katie Woodall		Agent for Prime S	Source, LLC		(30	2) 753-5305	(ktwoodall@wagi	nerreg.com)

This is a reproduction of EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete.

under applicable law.

Signature

4. Typed Name

Katie Woodall

Certification
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I

acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both

3. Title

5. Date

Agent for Prime Source, LLC

November 5th, 2019

6. Date Application

(Stamped)

Received

Please read instructions on reverse before completing form.		Form Appro	ved. OMB No. 2	070-006	60. Approval expires 05-31-98			
United S			Registrati		OPP Identifier Number			
EPA Environmental Pro	otection Agency		Amendme	ent				
Washington,		✓	Other					
	ation for Pesticide							
Company/Product Number	2. EPA Prod	uct Manage	er	3. P	Proposed Classification			
89442-23	Ca	therine Aut	oee					
4. Company/Product (Name)	PM#			1	None Restricted			
Prime Source, LLC /	_ ,	10		-				
Bifen 7.9SC Select; ABN: Bifen 7.9F Select, ABN: Lav Killer	wn Pest							
Name and Address of Applicant (Include Zip Code	6. Expedited	d Review.	In accordance	with F	IFRA Section 3(c)(3)			
Prime Source, LLC	(b)(I), my pro				position and labeling			
c/o Wagner Regulatory Associates, Inc.	to: EPA Reg. No).						
P.O. Box 640 Hockessin, DE 19707								
Check if this is a new address	Product Nam	e:						
	Section - II							
Amendment - Explain below.		printed labels by letter date	s in response to					
Resubmission in response to Agency letter dated	– *	oo" Applicati						
Notification - Explain below.		Other - Explain below.						
Explanation: Use additional page(s) if necessary. (For Section I and Section II.)								
CSF Notification to add sources of technical and notification is consistent with the provisions of PR Notice								
labeling or the confidential statement of formula of this produced	uct. I understand that it is a viol	ation of 18 L	J.S.C. Sec. 1001	to willf	fully make any false statement			
to EPA. I further understand that if this notification is not cor FIFRA and I may be subject to enforcement action and pena			nd 40 CFR 152.	46, this	product may be in violation of			
	Section - III							
1. Material This Product Will Be Packaged In:	T							
Child-Resistant Packaging Yes* Unit Packaging Yes	Water Soluble Pa	ackaging	2. Type of C	ontain Metal	er			
X No X No	X			Plastic				
	No. per If "Yes"	No. per		Glass				
	container Package wgt	container		Paper				
be submitted		ĺ		•	(Specify) HDPE lined bags			
				·				
	4. Size(s) Retail Container	5.	Location of L		irections			
X Label Container	1, 2.5, 5 gallons		X On Lab		accompanying product			
			On Eas	Jennig e	accompanying product			
Manner in Which Label is Affixed to Product	Lithograph		Otheradhe	sive ba	acked label			
	X Paper glued Stenciled							
1. Contact Daint (Complete items divestly helps for it	Section - IV		d if wassassan		and this application			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessar Name Title Telephone					lude Area Code)			
	t for Prime Source, LLC		(302) 635-72	.81 (ke	eva@wagnerreg.com)			
Certific: I certify that the statements I have made on this form and a		accurate and			e Application ceived			
I acknowledge that any knowingly false or misleading state					JCIV CU			
under applicable law.	2 Title				(Stamped)			
2. Signature Keleva Shulty	3. Title	Prime Source, LLC						

This is a reproduction of EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete.

5. Date

August 29, 2019

4. Typed Name

Keeva Shultz

Form Approved.	OMB No	2070_0060	Annroval	avnirae	N5_31.	_02
i oiiii Appioveu.	CIVID ING.	2010-0000.	Appiovai	CAPILCS	00-01	-30

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	-	

United States

	Registration
✓	Amendment
•	Other

OPP	Identifier Number	

	Environmental Protection /			Agency			ent				
	Washington	Washington, DC 20460				Other					
	IqqA	ication f	or Pes	ticide	- Sect	tion	ı I				
1. Company/Product Number				EPA Prod				3. P	roposed	Classi	ification
89442-23				Ca	atherine	Aub	ee				
4. Company/Product (Name)			PM;	-				-			
. , ,			1 1017	7	10			\square	None		Restricted
Prime Source, LLC / Bifen 7.9SC Select; ABN: Bife	n 7 0F Select ARN: I	awn Past			10						
Killer	11 7.91 Select, ADN. L	awii i est									
Name and Address of Appl	licant (Include Zip Cod	de)	6.	Expedite	d Revie	w. I	n accordance	with F	IFRA Se	ction 3	3(c)(3)
Prime Source, LLC	(· · · · · · /· · · · · ·	,					ar or identical				
c/o Wagner Regulatory As	sociates, Inc.		to:	A Reg. No	_						
P.O. Box 640				A Reg. INC	J.						
Hockessin, DE 19707			Pro	duct Nam	ne:						
☐ Check i	if this is a new addres										
		8	Section		printed la	sholo	in response to				
Amendment - Explain be	elow.				cy letter o						
Resubmission in respons	se to Agency letter dated		["Me T	Too" Appli	icatio	on.				
Notification - Explain belo	OW.			Other	r - Explair	n belo	OW.				
Explanation: Use additional											
CSF amendment to add a no regulations at 40 CFR 152.46, ar											
that it is a violation of 18 U.S.C. S	Sec. 1001 to willfully mak	ke any false s	statement	to EPA. I	further ur	nders	stand that if this	notifica	ation is no	t consi	stent with the
terms of PR Notice 98-10 and 40 sections 12 and 14 of FIFRA.) CFR 152.46, this produ	uct may be in	violation	of FIFRA	and I ma	ay be	e subject to enf	forceme	ent action	and pe	nalties under
SCOROLIS 12 and 14 or 1 in two.		S	ection	1 - III							
1. Material This Product Wil	I Be Packaged In:										
Child-Resistant Packaging	Unit Packaging		Water 9	Soluble P	ackagin	g	2. Type of C	Contain	er		
Yes*	Yes			Yes				Metal			
X No	χ No		Х	No			Χ	Plastic	:		
	If "Yes"	No. per	If "Yes"		No. per	r		Glass			
* Certification must	Unit Packaging wgt.	container	Package	e wgt	contain	ner		Paper			
be submitted								Other ((Specify)	HDPE	E lined bags
		4 6 ()									
3. Location of Net Contents Ir		4. Size(s)		ontainer		5.		of Label Directions			
X Label Cor	ntainer	1, 2.5, 5 g	allons				X On Lat				4
						L	On Lak	peling a	accompa	nying	product
6. Manner in Which Label is A	Affixed to Product		ithograp	h		0	ther adhe	sive ba	acked lab	el	
			Paper glu								
			Stenciled								
		S	ection	- IV							
1. Contact Point (Complete ite	ems directly below for	identificatio	n of indiv	vidual to l	be conta	ctea					
Name Title Keeva Shultz Agent for Prime S				11.0			Telephone N				
Keeva Shultz		cation	Source,	LLC			(302) 635-72		e Applica		eg.com)
I certify that the statements I hav			nts theret	o are true,	accurate	and			ceived	ation	
I acknowledge that any knowingl under applicable law.	y false or misleading sta	tement may b	e punisha	able by fine	e or impri	isonn	nent or both				
		2 T:41-							(Sta	mped)
2. Signature Shults	*	Title Agent for	r Prima 9	Source II	I C						
4. Typed Name		5. Date	i illie c	Zuruc, El							
Keeva Shultz		August 2	9, 2019	2019							

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This is a reproduction of EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete.

3. Title

5. Date

June 24, 2019

Agent for Prime Source, LLC

both under applicable law.

2. Signature

Kleva

4. Typed Name

Keeva Shultz

(Stamped)

Please read instructions on reverse before comple	leting form.	Form A		60. Approval expires 05-31
	United States		Registration	OPP Identifier Number

	United S	States				Registrati	on	OPP Identifi	er Number
Environmental Protection Ag			Agenc	v		Amendme	nt		
Washington, DC 20460				,	√	Other			
	Applic	cation for	Pestic	ide - Se	ection	<u> </u>		<u>I</u>	
1. Company/Product Number				A Product M			3. F	Proposed Clas	sification
89442-23				Richard	d Gebk	en			
4. Company/Product (Name)			PM#				 X	None	Restricted
Prime Source, LLC / Bifen 7.9S	SC Select				10			None	Restricted
ABN: Bifen 7.9F Select									
ABN: Lawn Pest Killer									
5. Name and Address of Applic	cant <i>(Include Zip Code</i>	e)				In accordance			
Prime Source, LLC			to:	ny product	is simi	lar or identical	III COI	nposition and	labeling
c/o Wagner Regulatory Ass P.O. Box 640	sociates, Inc.		EPA R	eg. No.					
Hockessin, DE 19707			Produc	t Name:					
☐ Check if	this is a new address								
		Sec	ction -	· II					
Amendment - Explain belo	ow.		$\overline{\checkmark}$	Final printe Agency lett		s in response to d So	eptemb	per 27 th , 2018	
Resubmission in response	e to Agency letter dated _			"Me Too" A				,	
Notification - Explain below	w.			Other - Exp	olain bel	low.			
Explanation: Use additional page(s) if necessary. (For Section I and Section II.)									
		Sec	ction -	III					
1. Material This Product Will	Be Packaged In:		-						
Child-Resistant Packaging	Unit Packaging	V		uble Packa	ging	2. Type of C		ner	
Yes*	Yes			es		l <u> </u>	Metal ⊇lastic		
X No	If "Yes"	No. per If	χ N "Yes"		222	^		,	
* Certification must			res ackage wo		per itainer		Glass Paper		
be submitted	Office ackaging wgt.	Container	ackage w		italiici		•	(Specify) HDF	PE lined hads
be sublificed									L lilled bags
Location of Net Contents Inf	formation	4. Size(s) R			5.	Location of L	abel D	Directions	
X Label Cont	ainer	16 oz., 1 qt.,	1, 2.5, 5	gallons		X On Lab			
						On Lab	eling	accompanying	g product
6. Manner in Which Label is At	ffixed to Product	Lith	ograph			Otheradhe	sive ba	acked label	
			per glued						
			nciled						
1 Combact Daint (Communicate its	man alive athe balance for i		tion -			al if management		vanana thin an	nlination \
Contact Point (Complete ite. Name	Title	dentification	ot inaiviai	uai to be co	ontacte			rocess triis ap _l clude Area Co	
Katie Woodall		t for Prime S	ource. LL	_C			`	woodall@wag	,
	Certific							te Application	
I certify that the statements I have	made on this form and a	all attachments				d complete. I		ceived	
acknowledge that any knowingly faunder applicable law.	alse or misleading staten	nent may be p	unishable	by fine or in	nprisoni	ment or both		(Stampe	d)
2. Signature		3. Title						Clampe	u,
JOLI.		Agent for P	rime Sou	rce, LLC					
4. Typed Name		5. Date							
Katie Woodall		April 1 st , 20	19						
		I ' '				1			

Agent for Prime Source, LLC

5. Date

January 28, 2019

Agent for Prime Source, LLC

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete.

I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or

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Keeva Shultz

2. Signature

4. Typed Name

Keeva Shultz

both under applicable law.

(302) 635-7281 (keeva@wagnerreg.com)

6. Date Application

Received

(Stamped)

and penalties under sections 12 a	nd 14 of FIFRA.						
		S	ection - II				
1. Material This Product Wil	l Be Packaged In:						
Child-Resistant Packaging Yes* No	Unit Packaging Yes X No	No. per	Water Solub Yes X No If "Yes"	e Packagir No. pe		Type of X	Container Metal Plastic Glass
* Certification must	Unit Packaging wgt.	container	Package wgt	contair	ner		Paper
be submitted							Other (Specify) HDPE lined bags
3. Location of Net Contents In	formation	4. Size(s) Retail Contai	ner	5. Lo	cation o	Label Directions
X Label Container 1, 2.5, 5 gallons X On La On La					abel abeling accompanying product		
6. Manner in Which Label is A	offixed to Product	X	Lithograph Paper glued Stenciled		Othe	radl	nesive backed label
		S	ection - I	<u> </u>			
, ,			on of individua	to be cont			ary, to process this application.)
Name Keeva Shultz	Title Age	-	e Source, LLC				No. (Include Area Code) 7281 (keeva@wagnerreg.com)
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. 6. Date Application Received (Stamped)							
2. Signature Agent for Prime Source, LLC							

5. Date

October 11, 2018

4. Typed Name

Keeva Shultz

Form Approved	OMB No. 2070-0060.	Approval expires	05-31-98
1 omm / tpprovou.	CIMB INC. Edit C CCCC.	, the tar extende	00 0.00

United States

	Registration	OPP Identifier Number
	Amendment	
✓	Other	

⊕EPA	Environmental Protection Agency Washington, DC 20460			Amendm Other	ent				
Application for				ide - Se	ection				
1. Company/Product Number		oution io	-	A Product N			3. F	Proposed Cla	ssification
89442-23				Richard	•			•	
Company/Product (Name	<u> </u>		PM#				_		
Prime Source, LLC / Bifen 7	•		1 10177		10		X	None	Restricted
ABN: Bifen 7.9F Select	.900 Ocicoi				10				
ABN: Lawn Pest Killer									
Name and Address of Ap	nlicant (Include Zin Coo	(a)	6 Evr	adited Par	viow	In accordance	e with F	FIFRA Section	3(c)(3)
-	plicant (molade zip ood	0)						nposition and	
Prime Source, LLC c/o Wagner Regulatory /	Associates Inc		to:	eg. No.					
P.O. Box 640	13300iate3, iiio.		LEFAIN	eg. No.					
Hockessin, DE 19707			Produc	t Name:					
☐ Check	k if this is a new address								
		Se	ection -						
Amendment - Explain	pelow.		$\overline{\checkmark}$	Final printe Agency lett		s in response t d	o May 11,	2018	
Resubmission in respo	nse to Agency letter dated		_ 🗆	"Me Too" A			,		
Notification - Explain b	elow.			Other - Exp	olain bel	ow.			
Explanation: Use additional page(s) if necessary. (For Section I and Section II.)									
		Se	ction -	III					
1. Material This Product W	/ill Be Packaged In:								
Child-Resistant Packaging	Unit Packaging			uble Packa	ging	2. Type of		ier	
Yes*	Yes			es			Metal		
X No	X No			0		Х	Plastic	;	
	If "Yes"	'	If "Yes"		per		Glass		
* Certification must	Unit Packaging wgt.	container	Package w	gt con	tainer		Paper		
be submitted							Other	(Specify) HD	PE lined bags
3. Location of Net Contents	Information	4. Size(s)	Retail Con	tainer	5.	Location of	Label D	Directions	
X Label Co	ontainer	16 oz., 1 qt	., 1, 2.5, 5	gallons		X On La	abel		
						On La	abeling	accompanyin	g product
6. Manner in Which Label is	Affixed to Product		thograph			Otheradh	esive ba	acked label_	
			aper glued enciled						
			ction -						
Contact Point (Complete		identificatior	n of individ	ual to be co	ontacte				
Name	Title	at fan Drivaa	Caa. 1.1	0		•	•	clude Area Co	•
Barbarette Young-Henry		nt for Prime	Source, LL			(302) 635-7			gnerreg.com)
I certify that the statements I ha acknowledge that any knowingl under applicable law.		all attachment						te Application ceived (Stampe	
2. Signature 3. Title								ζ	,
Carlanthe Joney Henry		Agent for	Prime Sou	rce, LLC					
4. Typed Name		5. Date							
Barbarette Young-Henry September			r 14, 2018						

~ FD4		United States				Registra		OPP Identifier Number	
⊕EPA □	Environmental Protection A Washington, DC 20460			СУ	✓	Amendm Other	ent		
		Application f	or Pest	icide	- Sectio	n I		l	
1. Company/Product Numbe					luct Manag		3. I	Proposed Classification	
89442-23				Ri	chard Geb	ken			
4. Company/Product (Name)		PM#					Nama 🗖 Baatwistas	
Prime Source, LLC / Bifen 7. ABN: Bifen 7.9F Select ABN: Lawn Pest Killer	9SC Select				10		X	None Restricted	
5. Name and Address of Ap	plicant <i>(Include 2</i>	Zip Code)	6. E x	cpedite	d Review.	In accordance	e with I	FIFRA Section 3(c)(3)	
•	,	,	(b)(l)					mposition and labeling	
Prime Source, LLC c/o Wagner Regulatory A	ssociates, Inc.		to: EPA	Reg. No	o.				
P.O. Box 640 Hockessin, DE 19707			Produ	uct Nam	ie.				
☐ Check	t if this is a new a	address							
		S	ection	- 11					
Amendment - Explain b	pelow.				printed label	ls in response t)		
Resubmission in respo	nse to Agency lette	er dated	_ □	•	oo" Applicat				
Notification - Explain be	elow.			Other - Explain below.					
Explanation: Use additiona	I page(s) if neces	ssary. (For Section	n I and Se	ction II.	.)				
Add the additional Alternat This notification is consistent wi labeling or the confidential state to EPA. I further understand that FIFRA and I may be subject to e	th the provisions of ment of formula of t if this notification	f PR Notice 98-10 a this product. I unde is not consistent wit and penalties unde	and EPA regrestand that in the terms rections 1:	gulations t is a vio of PR N 2 and 14	at 40 CFR lation of 18 lotice 98-10 a	152.46, and no U.S.C. Sec. 10	1 to will	lfully make any false statemer	
			ection	<u>- III</u>					
 Material This Product W Child-Resistant Packaging 	Unit Packager		Water S	oluble F	ackaging	2. Type of	Contair	ner	
Yes*	Yes	.9		Yes	gg	1 1 1 1 1 1 1 1 1	Metal		
X No	X No		Х	No		X	Plasti	С	
	If "Yes"	No. per	If "Yes"		No. per		Glass		
* Certification must	Unit Packaging	wgt. container	Package	wgt	container		Paper	•	
be submitted							Other	(Specify) HDPE lined bags	
3. Location of Net Contents	Information	4. Size(s) Retail Co	ntainer	5	. Location of	Label [Directions	
X Label Co	ontainer	16 oz., 1	qt., 1, 2.5,	5 gallor	ns	X On La		accompanying product	
6 Mannar in Which Label is	Affixed to Dradu	at 🖂	ithograph			Other edb	aaiya b	ankad lahal	
Manner in Which Label is	Affixed to Produ	Х	₋ithograph Paper glue Stenciled	d	<u> </u>	Otheradh	esive b	acked label	
		S	ection	- IV					
1. Contact Point (Complete	items directly bei		on of indivi	idual to	be contact				
Name		Title				1	•	clude Area Code)	
Katie Woodall		Agent for Prime	e Source, I	LC		(302) 753-5		twoodall@wagnerreg.com)	
I certify that the statements I has acknowledge that any knowingly	ve made on this fo							te Application eceived	
under applicable law.		0 7"						(Stamped)	
2. Signature 🔣 🖊 🥕		3. Title							

Agent for Prime Source, LLC

5. Date

August 9, 2018

4. Typed Name

Katie Woodall

Please read instructions on reverse before completing form.	
, ,	

Form Approved. OMB No. 2070-0060. Approval expires 05-31-98

æ	F	Μ
v		_

United States

	Registration	OPP Identifier Number
	Amendment	
✓	Other	

⊕EPA	Environmental F Washingto	Protection n, DC 2046		✓	Amendm Other	ent		
	Application for Pesticide - Section I							
1. Company/Product Numb		il Cation i	2. EPA Prod			3. F	Proposed Cla	ssification
89442-23				chard Geb			'	
Company/Product (Nam	ne)		PM#					
Prime Source, LLC / Bifen	•		1 IVIII	10		X	None	Restricted
ABN: Bifen 7.9F Select	7.500 00.000			10				
ABN: Lawn Pest Killer								
Name and Address of A	policant (Include Zin Co	nda)	6 Evnoditor	d Boylow	In accordance	o with E	TIEDA Soction	n 2(n)(2)
	pplicant (<i>include zip C</i> c	ide)			In accordanc nilar or identica			
Prime Source, LLC	Associates Inc		to:				•	J
c/o Wagner Regulatory P.O. Box 640	Associates, inc.		EPA Reg. No	0.				
Hockessin, DE 19707			Product Nam	ne:				
☐ Che	ck if this is a new addres							
		S	Section - II					
Amendment - Explair	below.			printed labe cy letter dat	els in response to ed	o May 11,	2018	
Resubmission in resp	onse to Agency letter date	d	_	oo" Applica		,		
Notification - Explain	below.		Other	- Explain b	elow.			
Explanation: Use addition	nal page(s) if necessary.	(For Section	on I and Section II.	.)				
		S	ection - III					
1. Material This Product					T			
Child-Resistant Packaging Yes*	Unit Packaging Yes		Water Soluble P	ackaging	2. Type of	Contair Metal	ner	
l						Plastic		
X No	X No	No. per	X No	No. per	X		,	
* Contification moved	Unit Packaging wgt.	container	Package wgt	container		Glass Paper		
* Certification must be submitted	Office ackaging wgt.		i ackage wgt			•		PE lined bags
be submitted						Outci	(Opcony) Tib	i L iiiica bags
Location of Net Content	s Information	4. Size(s) Retail Container		5. Location of	Label [Directions	
X Label (Container	16 oz., 1	qt., 1, 2.5, 5 gallon	าร	X On La			
					On La	beling	accompanyin	g product
6. Manner in Which Label	is Affixed to Product		_ithograph		Otheradh	esive b	acked label	
			Paper glued					
			Stenciled					
		S	ection - IV					
Contact Point (Complete			on of individual to	be contac				
Name	Titl	_			•	•	clude Area Co	,
Barbarette Young-Henry	Ag	ent for Prime	e Source, LLC		(302) 635-7	279 (ba	arbarette@wa	agnerreg.com)
I certify that the statements I hacknowledge that any knowing under applicable law.	nave made on this form and						te Applicatior ceived (Stampe	
Signature		3. Title					(Stanipe	.u,
			r Prime Source, LLC					
Barbarthe Jourg Henry			,					
4. Typed Name		5. Date						
Barbarette Young-Henry June 25, 2018								

Please read instructions on revers	se before completino	a form		Form An	proved (OMB No. 2	070-00	60 Approva	l expires 05-31-98
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⊕EPA ■	or nvironmenta	nited States	Agency			nendme			
VLIA -		gton, DC 20460		_	_	her			
	Aı	oplication fo	r Pesticide	- Sect					
1. Company/Product Number			2. EPA Pro				3. F	roposed Cl	assification
89442-23			R	ichard G	ebken				
4. Company/Product (Name)			PM#					None	Restricted
Prime Source, LLC / Bifen 7.9	SC Select ABN: B	Bifen 7.9F Select		10				None	Restricted
5. Name and Address of App	licant <i>(Include Zip</i>	Code)	6. Expedite						
Prime Source, LLC			(b)(I), my pro to:	oduct is s	imilar oı	· identical	in con	nposition an	ıd labeling
c/o Wagner Regulatory As	ssociates, Inc.		EPA Reg. N	Ο.					
P.O. Box 640 Hockessin, DE 19707			Product Nar	ne:					
_	if this is a new add	dress	T Toddot Hai						
		Se	ection - II						
Amendment - Explain be	elow.			printed la		sponse to			
Resubmission in respons	se to Agency letter d	lated	– *	Too" Appli		_			
✓ Notification - Explain bel	ow.		Othe	r - Explain	below.				
Explanation: Use additional	page(s) if necessa	ary. (For Section	I and Section II	.)					
Notification to correct minor This notification is consistent with labeling or the confidential statem	n the provisions of P	R Notice 98-10 an	d EPA regulations	at 40 CF	R 152.46	i, and no d	ther ch	anges have	
to EPA. I further understand that FIFRA and I may be subject to en						CFR 152.	.46, this	product may	y be in violation of
· · · · · · · · · · · · · · · · · · ·			ction - III						
1. Material This Product Wi	II Be Packaged Ir								
Child-Resistant Packaging	Unit Packaging Yes		Water Soluble F	Packagin	g 2.	Type of C		er	
Yes*							Metal Plastic		
X No	X No	No. per	X No	No. per		\longrightarrow	Glass	•	
* Certification must	Unit Packaging w		Package wgt	contain			Paper		
be submitted				1				(Specify) H	DPE lined bags
			.					,	
3. Location of Net Contents Ir		` ′	Retail Container			ation of L		rections	
X Label Cor	ntainer	16 oz., 1 qt	t., 1, 2.5, 5 gallo	ns	X	On Lab		accompany	ing product
6. Manner in Which Label is A	Affixed to Product	X Pa	thograph aper glued tenciled		Other	adhe	sive ba	acked label ₋	
		Se	ction - IV						
1. Contact Point (Complete it	ems directly below	v for identification	of individual to	be conta					
Name		Title			Tel	ephone N	lo. (Inc	lude Area (Code)
Katie Woodall		Agent for Prime	Source, LLC		(30	2) 753-53	305 ktw	oodall@wa	ignerreg.com
I certify that the statements I have acknowledge that any knowingly	e made on this form					nplete. I		e Application	on
under applicable law.		10 ====						(Stam	ped)
2. Signature		3. Title	Duine C						
	V*		Prime Source, L	.LU					
Typed Name		5. Date							

March 15th, 2018

Katie Woodall

Keeva Shultz Agent for Prime Source, LLC (302) 635-7281 (keeva@wagnerreg.com) Certification 6. Date Application I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. Received I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. (Stamped) 2. Signature 3. Title Shults Kleva Agent for Prime Source, LLC 5. Date

March 8, 2018

This is a reproduction of EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete.

Name

Typed Name Keeva Shultz Telephone No. (Include Area Code)

Keeva Shultz Agent for Prime Source, LLC (302) 635-7281 (keeva@wagnerreg.com) Certification 6. Date Application I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. Received I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. (Stamped) 2. Sighature 3. Title Shults Kleva Agent for Prime Source, LLC 5. Date 4. Typed Name

December 1, 2017

This is a reproduction of EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete.

Name

Keeva Shultz

Telephone No. (Include Area Code)

Please read instructions on revers	se before completing form	n.		Form Appro	ved. OMB No. 2	070-006	60. Approval expires 05-31-98
		J. 1			Registrati	ion	OPP Identifier Number
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⊕EPA □	nvironmental P				Amenume	ent	
	Washington	, DC 20460		√	Other		
	Appli	cation fo	or Pesticide	- Section	n I		
1. Company/Product Number			2. EPA Pro	oduct Manage	er	3. P	roposed Classification
89442-23				Kable Bo Dav	vis		111111111111111111111111111111111111111
4. Company/Product (Name)			PM#				None Restricted
Prime Source LLC				3		_	None L Hessiell
Bifen 7.9SC Select; ABN: Bife		451	C Evnodit	- d Boulow	In accordance	with E	155 A Cartion 2/0\/2\
Name and Address of Appl Prime Source LLC	Icani (Include Zip Coo	ie)					FIFRA Section 3(c)(3) nposition and labeling
c/o Wagner Regulatory As	sociates, Inc.		to:				3) V 200 1 V 200 200 200 200 200 200 200 200 200 2
P.O. Box 640 Hockessin, DE 19707			EPA Reg. N	NO.			
	f this is a new address	9	Product Na	me:			
	Time to a free same	10	ection - II				- 4
Amendment - Explain be	low.		☐ Fina		s in response to		
Resubmission in respons	se to Agency letter dated			ency letter date Too" Applicati			
Notification - Explain belo				er - Explain be			
Explanation: Use additional		(For Section		3,000	10,101		
Notification to add additional p							
updated to reflect the transferre	ed product information						No. for this active has been 10 and EPA regulations at 40
CFR 152.46, and no other change	es have been made to th	ne labeling or	the confidential st	tatement of for	rmula of this pro	duct. I u	inderstand that it is a violation
of 18 U.S.C. Sec. 1001 to willfully 98-10 and 40 CFR 152.46, this pr							
FIFRA.	ATOM AND TOUR OF TURKER,	AND STATE	u 7.1.4 A 10.00 Bu	20700	11 12 1 0 1 0 1 0 1 0 1 0 1 0 1 0 1 0 1		A. California and A. California
1. Material This Product Wil	I Bo Booksaad In:	5	ection - III				
Child-Resistant Packaging	Unit Packaging	-	Water Soluble	Packaging	2. Type of C	Contain	er
Yes*	Yes		Yes			Metal	
X No	X No		X No		X	Plastic	
1.72	If "Yes"	No. per	If "Yes"	No. per		Glass	
* Certification must	Unit Packaging wgt.	container	Package wgt	container		Paper	
be submitted						Other ((Specify) HDPE lined bags
3. Location of Net Contents Ir	nformation	4. Size(s)	Retail Containe	r 5.	. Location of L	abel D	virections
	tainer	1, 2.5, 5 ga			X On Lat		
					On Lah	oeling a	accompanying product
6. Manner in Which Label is A	Afficed to Draduct	T. Li	:the graph		Othor adho	alua he	alad labal
6. Manner in Which Laber is A	Affixed to Product		ithograph aper glued		Otheradhe	Sive ba	acked label
			tenciled				
		S	ection - IV	-			
1. Contact Point (Complete its	ems directly below for		* A C (A) C (A) (A) (A)	o be contacte	ed, if necessar	y, to pr	ocess this application.)
Name	Title		A		Telephone N	lo. (Inc	lude Area Code)
Kt Woodall	Age Certifi		Source LLC				woodall@wagnerreg.com) e Application
I certify that the statements I have	e made on this form and	all attachme			nd complete.		ceived
I acknowledge that any knowingle both under applicable law.	y false or misleading sta	tement may b	e punishable by fi	ine or imprison	ment or		(Stamped)
2. Signature		3. Title					(Stamped)
you	·	The state of the s	Prime Source L	LC			
4. Typed Name 5. Date				= = =			

, P P . O	.pp. 0. 0 0 1 1 2 1 1 0 1 2 0 1 0 0 0 0 0 1 1 1 1					
	Registration	OPP Identifier Number				
	Amendment					
✓	Other					

⊕EPA □	United nvironmental Pr		n Agenc	V		Am	nendme	nt			
	Washington, DC 20460			✓	Oth	ner					
	Appli	cation fo	or Pesti	cide - S	ectio	n I					
1. Company/Product Number 89442-23			2. EP	A Product Kable	: Manag e Bo Da			3. P	roposed	Class	ification
4. Company/Product (Name)			PM#					1	None	П	Restricted
Prime Source LLC /					3				140110	ш	rtoothotou
Bifen 7.9SC Select ABN: B	ifen 7.9F Select										
5. Name and Address of Appl Prime Source, LLC c/o Wagner Regulatory As		de)	(b)(l), to:	pedited R my produc Reg. No.							
P.O. Box 640 Hockessin, DE 19707				ct Name:							
☐ Check i	f this is a new address										
Amendment - Explain be	low	S	ection		tod labo	le in ro	sponse to				
			ᆜ	Agency le	etter date	ed	- sporise to				
Resubmission in respons Notification - Explain belo			_ 📙	"Me Too" Other - E							
		(For Section	n Land Se		хрічії в	0.011.					
Explanation: Use additional page(s) if necessary. (For Section I and Section II.) Notification to add Alternate #3. Additional Source of TGAI. This notification is consistent with the provisions of PR Notice 98-10 EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.					mula of this stand that if						
		S	ection -	·							
Material This Product Will Child-Resistant Packaging	I Be Packaged In: Unit Packaging		Water So	luble Pack	(aging	2 -	Гуре of Co	ontain	<u>or</u>		
Yes*	Yes			labic i aci ∕es	vagirig	-		∕letal	Ci		
X No	χ No		X 1	No		•	X	Plastic			
	If "Yes"	No. per	If "Yes"	N	o. per		(Glass			
* Certification must	Unit Packaging wgt.	container	Package w	gt co	ontainer			Paper			
be submitted								Other ((Specify)	HDPE	E lined bags
Location of Net Contents Ir		, ,	Retail Cor	ntainer	5	. Loc	ation of La		irections	;	
X Label Con	tainer	1, 2.5, 5 g	allons			Х	On Lab		accompa	ınying	product
6. Manner in Which Label is Affixed to Product Lithograph Paper glued Stenciled Otheradhesive backed label											
Section - IV											
Contact Point (Complete ite			n of individ	lual to be	contact						
Name Title Kt Woodall Agent for Prime Source,			Source, L	LC			ephone No 2) 635-728				e) erreg.com)
I certify that the statements I hav I acknowledge that any knowingl both under applicable law.		all attachme					plete.		e Applic ceived (Sta	ation amped)
2. Signature		3. Title							,	1	•
ASC.			Prime Sou	ırce, LLC.							
4. Typed Name		5. Date	10th 2016								

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	Registration	OPP Identifier Number						
	Amendment							
✓	Other							

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	Washington, DC 20460			-/	Other				
			Doot	ioido Co	v otio:				
Company/Product Number	Аррііс	cation for		PA Product M			3 6	Proposed C	lassification
89442-23					nanage	4 1] 5.	торозса О	assilication
				Kable Bo Davis					
4. Company/Product (Name)	.		PM#				X	None	Restricted
Prime Source, LLC / Bifen 7.9			3						
5. Name and Address of Appl	icant (<i>Include Zip Cod</i>	le)				In accordance lar or identica			
Prime Source, LLC c/o Wagner Regulatory As	sociates, Inc.		to: EPA I	Reg. No.					
P.O. Box 640 Hockessin, DE 19707			Produ	uct Name:					
· —	f this is a new address	}	11000	ot Hamo.					
		Sec	ction	-					
Amendment - Explain be	low.		<u> </u>	Final printe		in response to)		
Resubmission in respons	se to Agency letter dated			Agency lett "Me Too" A			August	<u>19, 2015</u>	
Notification - Explain belo			· ⊔	Other - Exp					
Explanation: Use additional	page(s) if necessary. ((For Section I	I and Se	ection II.)					
Updated address change.									
		Sec	ction	-					
1. Material This Product Will Be Packaged In:									
Child-Resistant Packaging	Unit Packaging	V		oluble Packa	ging	2. Type of		ner	
Yes*	Yes			Yes			Metal		
X No	X No	N 16		No		Х	Plastic	;	
	If "Yes"	'	f "Yes"		per		Glass		
* Certification must	Unit Packaging wgt.	container P	Package v	wgt con I	tainer		Paper		DDE line dibina
be submitted							Otner	(Ѕресіту) Н	DPE lined bags
3. Location of Net Contents In	formation	4. Size(s) R	etail Co	ntainer	5.	Location of	Label [Directions	
X Label Con	tainer	1, 2.5, 5 gall	lons			X On La	bel		
						On La	beling	accompany	ring product
6. Manner in Which Label is A	Affixed to Product	Lith	nograph			Otheradh	esive b	acked label	
		X Par	per glue					•	
		Ste	nciled						
		Sec	ction	- IV					
Contact Point (Complete ite		identification	of indivi	dual to be co	ontacte				
Name Kari Albright	Title	nt for Prime S	cource I	1.0		Telephone I (302) 635-7		clude Area (Code)
Kan Albright	Ager	it ioi Filine 3	ouice, L	LLC		kari.albright		nerreg.com	
	Certific							te Application	on
I certify that the statements I hav I acknowledge that any knowingly							Re	ceived	
both under applicable law.	·		•		•			(Stam	ped)
2. Signature 3. Title									
Kan allenght		Agent for P	Prime Source, LLC						
U									
4. Typed Name		5. Date							
Kari Albright September 23, 2016									

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	Registration	OPP Identifier Number
	Amendment	
√	Other	
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□ PhA United States									
Environmental Protection A			n Agency			Amendm	ent		
	Washington,	DC 20460)		√	Other			
	Appli	cation fo	or Pesticide	- Se	ction	n I			
1. Company/Product Number			2. EPA Pro	duct N	1anage	er	3. P	roposed Cla	ssification
89442-23			Kable Bo Da	avis					
4. Company/Product (Name)			PM#					None	Restricted
Prime Source LLC /			3					None	Nestricted
Bifen 7.9SC Select ABN: B	ifen 7.9F Select								
5. Name and Address of Appl	icant (<i>Include Zip Cod</i>	e)		6. Expedited Review. In accordance with FIFRA Section 3(c)(3)					
Prime Source, LLC			to:	(b)(I), my product is similar or identical in composition and labeling to:					
c/o Wagner Regulatory As P.O. Box 640	sociates, Inc.		EPA Reg. N	EPA Reg. No.					
Hockessin, DE 19707			Product Nar	me:					
_	f this is a new address		1 Toddot Hai						
		S	ection - II						
Amendment - Explain be	low.			I printe		s in response t)		
Resubmission in respons	se to Agency letter dated			Too" A					
Notification - Explain belo	ow.		Othe	er - Exp	lain bel	low.			
Explanation: Use additional	page(s) if necessary.	(For Section	n I and Section I	l.)					
Notification to add additiona		00 40	d CDA	-+ 40 0	NED 45	0.40 and a a	مرم مام سما		
This notification is consistent with labeling or the confidential statement									
to EPA. I further understand that it	f this notification is not co	nsistent with	the terms of PR N	Notice 9	98-10 a				
FIFRA and I may be subject to en	iorcement action and per		ection - III	4 01 F11	-KA.				
1. Material This Product Wil	I Be Packaged In:		ection - in						
Child-Resistant Packaging	Unit Packaging		Water Soluble	Packa	ging	2. Type of	Contain	er	
Yes*	Yes		Yes				Metal		
χ No	χ No		χ No			Х	Plastic	;	
	If "Yes"	No. per	If "Yes"	No.	per	1	Glass		
* Certification must	Unit Packaging wgt.	container	Package wgt	con	tainer		Paper		
be submitted							Other	(Specify) HDI	PE lined bags
Location of Net Contents Ir	oformation	4 Size(s)	Retail Containe	r	5	Location of	Lahel D)irections	
	tainer	1, 2.5, 5 ga		1	٥.			/II GCIIOI IS	
A Label Coll	taniei	1, 2.5, 5 g	alions					accompanyin	a product
On Labeling accompanying product									
6. Manner in Which Label is Affixed to Product Lithograph Otheradhesive backed label									
X Paper glued Stenciled									
Section - IV									
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)NameTitleTelephone No. (Include Area Code)									
Cheryl Wagner Agent for Prime Source, LLC (302) 635-7289 Cheryl@wagnerreg.com									
Certification 6. Date Application									
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. Received Received									
both under applicable law. (Stamped)									
2. Signature 2 Dagne 3. Title			(2.55.)					•	
2. Signature Agent for F			Prime Source, I	LLC.					
4. Typed Name 5. Date									
Cheryl Wagner June 24			2016						

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FOITH Approved	. UIVID INO	. 2070-0000.	Approvai	expires	05-31-90

Approved: CIVIB 140: 2070 0000: Approval expires 00 01						
	Registration	OPP Identifier Number				
	Amendment					
✓	Other					

United States Environmental Protection Agency			Amendme	ent		
	• •			,,,,		
Washington, DC 2		✓	Other			
• • • • • • • • • • • • • • • • • • • •	on for Pesticide - Se			I o s		.6
1. Company/Product Number	2. EPA Product M	lanage	er	3. P	roposed Class	sification
89442-23	Kable Bo Davis			1		
4. Company/Product (Name)	PM#			\boxtimes	None	Restricted
Prime Source LLC /	3	3				
Bifen 7.9SC Select ABN: Bifen 7.9F Select						
5. Name and Address of Applicant (Include Zip Code)		6. Expedited Review . In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling				
Prime Source, LLC	to:	to:				
c/o Wagner Regulatory Associates, Inc. P.O. Box 640	EPA Reg. No.					
Hockessin, DE 19707	Product Name:					
Check if this is a new address						
	Section - II					
Amendment - Explain below.	Final printed Agency lette		in response to			
Resubmission in response to Agency letter dated						
Notification - Explain below.	Other - Exp	lain bel	ow.			
Explanation: Use additional page(s) if necessary. (For S	Section I and Section II.)					
Notification to add additional producer to CSFs. This notification is consistent with the provisions of PR Notice 98-	10 and EDA regulations at 40 C	CD 15	2.46 and no oth	or chan	agos havo hoon i	made to the
labeling or the confidential statement of formula of this product. I	understand that it is a violation	of 18 U	.S.C. Sec. 1001	to willfu	ully make any fa	se statement
to EPA. I further understand that if this notification is not consiste FIFRA and I may be subject to enforcement action and penalties	nt with the terms of PR Notice 9 under sections 12 and 14 of FIF	98-10 aı FRA.	nd 40 CFR 152.	46, this	product may be	in violation of
	Section - III					
Material This Product Will Be Packaged In:						
Child-Resistant Packaging Yes* Unit Packaging Yes	Water Soluble Packa	ging	2. Type of C	contain Metal	er	
	X No			wetai Plastic		
X No X No If "Yes" No. p		ner		r lastic Glass	'	
* Certification must Unit Packaging wgt. conta		tainer		Paper		
be submitted				•	(Specify) HDPI	E lined bags
						<u> </u>
	ize(s) Retail Container	5.	Location of L		irections	
X Label Container 1, 2.5	5, 5 gallons	gallons X On Label On Labeling accompanying produ				product
			On Lak	cing a	accompanying	product
6. Manner in Which Label is Affixed to Product Lithograph Otheradhesive backed label						
X Paper glued Stenciled						
Section - IV						
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.) Name Title Telephone No. (Include Area Code)						
1 1	Prime Source, LLC				eryl@wagnerre	
Certification 6. Date Application						
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. Received I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or						
both under applicable law. (Stamped)						
Cheul & Wagnen	. Title					
Age	ent for Prime Source, LLC.					
	Date]			
Charyl Wagner	0 10th 2016		I			



United States

Environmental Protection Agency

Washington, DC 20460

Formulator's Exemption Statement

(40 CFR 152.85)

Applicant's Name and Address

Prime Source LLC

c/o Wagner Regulatory Associates, Inc.

P.O. Box 640

Hockessin, DE 19707

EPA File Symbol/Registration Number

89442-23

Product Name

Bifen 7.9SC Select

Date of Confidential Statement of Formula (EPA Form 8570-4)

01/25/2017

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Bifenthrin

- (2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).
- (3) Indicate by checking (A) or (B) below which paragraph applies:
- √ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement.

 That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

- (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.
- (4) The following active ingredients in this product qualify for the formulator's exemption.

Source				
Active Ingredient	Product Name	Registration Number		
Bifenthrin				
Signature	Name and Title	Date		
KDI.	Ogongi Ogongi, Agent	11/06/2020		

EPA Form 8570-27 (Rev. 06-2004)

Copy 1 – EPA Copy 2 - Applicant copy



United States

Environmental Protection Agency

Washington, DC 20460

Formulator's Exemption Statement

(40 CFR 152.85)

Applicant's Name and Address

Prime Source LLC

c/o Wagner Regulatory Associates, Inc.

P.O. Box 640

Hockessin, DE 19707

EPA File Symbol/Registration Number

89442-23

Product Name

Bifen 7.9SC Select

Date of Confidential Statement of Formula (EPA Form 8570-4)

11/06/2020

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Bifenthrin

- (2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).
- (3) Indicate by checking (A) or (B) below which paragraph applies:
- √ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement.

 That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

- (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.
- (4) The following active ingredients in this product qualify for the formulator's exemption.

Source				
Active Ingredient	Product Name	Registration Number		
Bifenthrin				
Signature	Name and Title	Date		
	Ogongi Ogongi, Agent	11/06/2020		

EPA Form 8570-27 (Rev. 06-2004)

Copy 1 – EPA Copy 2 - Applicant copy

November 25, 2020

Document Processing Desk Attn: Jacquelyn Herrick, PM 3 Registration Division U.S. Environmental Protection Agency Office of Pesticide Programs (7505P) Room S-4900, One Potomac Yard 2777 South Crystal Drive Arlington, Virginia 22202-4501



Subject: Bifen 7.9SC Select – EPA Reg. No. 89442-23 - ABN: Bifen 7.9F Select; ABN: Lawn Pest Killer; ABN: Ike's Farm, Home, Garden Lawn Pest Killer. FPL

Dear Ms. Herrick,

Wagner Regulatory Associates, Inc., as agent for Prime Source LLC (EPA Co. 89442), respectfully submits the enclosed FPL as required by the EPA letter dated August 03, 2020. In support of this request, enclosed are the following documents:

- Letter from Prime Source LLC, appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Registration (8570-1)
- Final Printed Label

Thank you in advance for your efforts in reviewing this submission. Please do not hesitate to contact me by email at ogongi@wagnerreg.com or by phone at 302-239-7369 should you have any questions.

Respectfully submitted,

Ogongi Ogongi

Agent for Prime Source, LLC

November 06, 2020

Document Processing Desk (NOTIF) Attn: Jacquelyn Herrick, PM 3 Registration Division U.S. Environmental Protection Agency Office of Pesticide Programs (7505P) Room S-4900, One Potomac Yard 2777 South Crystal Drive Arlington, Virginia 22202-4501



Subject: Bifen 7.9SC Select – EPA Reg. No. 89442-23 - ABN: Bifen 7.9F Select; ABN: Lawn Pest Killer; ABN: Ike's Farm, Home, Garden Lawn Pest Killer CSF Notification – Add Sources of Technical, Update Registrants of technicals, Correct Purity of Technical and add Producers

Dear Ms. Herrick,

Wagner Regulatory Associates, Inc., as agent for Prime Source, LLC (EPA Co. 89442), is submitting a CSF notification adding a new source of technical as Alt. 11 and 12 CSF. Additional revisions include;

- Update registrant's name and address in the Basic, Alt. 2, Alt. 3, Alt. 5, Alt. 8 and Alt. 9 CSFs.
- Update EPA registration number of the technical in the Basic, Alt. 2, Alt. 8 and Alt. 9 CSFs.
- Correct purity of technical in Alt. 9 CSF
- Add new producers to all CSFs.

This submission supersedes a pending action that was submitted on August 29, 2019.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

In support of this request, the following documents are being submitted electronically via the EPA CDX PSP portal:

- Letter from Prime Source, LLC appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Notification (8570-1)
- Confidential Statement of Formula (8570-4) Basic Alternate # 12
- Formulators Exemption (8570-27)

Thank you in advance for your efforts in reviewing this submission. Please do not hesitate to contact me by email at ogongi@wagnerreg.com or by phone at 302-239-7369 should you have any questions.

Respectfully submitted,

Ogongi Ogongi

Agent for Prime Source, LLC

December 10, 2019

Document Processing Desk (AMEND) Attn: Jacquelyn Herrick, PM 3 Registration Division U.S. Environmental Protection Agency Office of Pesticide Programs (7505P) Room S-4900, One Potomac Yard 2777 South Crystal Drive Arlington, Virginia 22202-4501



Subject: Bifen 7.9SC Select – EPA Reg. No. 89442-23 - ABN: Bifen 7.9F Select; ABN: Lawn Pest Killer;

ABN: Ike's Farm, Home, Garden Lawn Pest Killer

Label Amendment

Dear Ms. Herrick,

Wagner Regulatory Associates, Inc., as agent for Prime Source, LLC (EPA Co. 89442), is submitting a label amendment adding Optional Marketing Statements and minor label revisions to match the Me-Too label - EPA Reg. No. 53883-118.

In support of this request, the following documents are being submitted electronically via the EPA CDX PSP portal:

- Letter from Prime Source, LLC appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Amendment (8570-1)
- Formulator's Exemption Statement (8570-27)
- Data Matrix, EPA internal and public copies (8570-35)
- Copy of the label highlighted and clean version
- EPA Certification Statement Form 8570-34

Thank you in advance for your efforts in reviewing this submission. Please do not hesitate to contact me by email at ogongi@wagnerreg.com or by phone at 302-239-7369 should you have any questions.

Respectfully submitted,

Ogongi Ogongi

Agent for Prime Source, LLC

November 05, 2019

Document Processing Desk (AMEND) Attn: Jacquelyn Herrick, PM 3 Registration Division U.S. Environmental Protection Agency Office of Pesticide Programs (7505P) Room S-4900, One Potomac Yard 2777 South Crystal Drive Arlington, Virginia 22202-4501



Subject: Bifen 7.9SC Select – EPA Reg. No. 89442-23 - ABN: Bifen 7.9F Select; ABN: Lawn Pest Killer;

ABN: Ike's Farm, Home, Garden Lawn Pest Killer

Label Amendment

Dear Ms. Herrick,

Wagner Regulatory Associates, Inc., as agent for Prime Source, LLC (EPA Co. 89442), is submitting a label amendment adding Optional Marketing Statements and minor label revisions to match the Me-Too label - EPA Reg. No. 53883-118.

In support of this request, the following documents are being submitted electronically via the EPA CDX PSP portal:

- Letter from Prime Source, LLC appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Amendment (8570-1)
- Formulator's Exemption Statement (8570-27)
- Data Matrix, EPA internal and public copies (8570-35)
- Copy of the label highlighted and clean version

Thank you in advance for your efforts in reviewing this submission. Please do not hesitate to contact me by email at ogongi@wagnerreg.com or by phone at 302-239-7369 should you have any questions.

Respectfully submitted,

Ogongi Ogongi

Agent for Prime Source, LLC

Electronic Submission

May 18, 2021

Document Processing Desk (AMENDMENT)
Ms. Jacquelyn Herrick (PM 03)
Registration Division (7505P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
One Potomac Yard (South Bldg)
2777 South Crystal Dr.
Arlington, VA 22202

Re: Bifen 7.9SC Select EPA Reg. No. 89442-023

Dear Ms. Herrick,

The enclosed submission consists of proposed Alternate CSFs #5-7 for the above referenced product. The purpose of the submission is to allow for the use of additional registered technical source. Some inerts supplier names were changed to "commodity" as they are approved in the commodity list.

A proposed new formulation is also include for CSF #7.

Please don't hesitate to contact me if you have any questions.

Best Regards,

Kerly Pastor

Regulatory Manager

Kerly Pastor

Albaugh, LLC

kerlyp@albaughllc.com

November 5th, 2019

Document Processing Desk (NOTIF) ATTN: Jacquelyn Herrick (PM 3) Registration Division (7504P) U.S. Environmental Protection Agency One Potomac Yard 2777 South Crystal Drive Arlington, Virginia 22202



Subject: Bifen 7.9SC Select – EPA Registration No. 89442-23

ABN: Bifen 7.9F Select; ABN: Lawn Pest Killer; ABN: Ike's Farm, Home, Garden Lawn Pest Killer

Final Print Label Submission

Dear Ms. Herrick,

Wagner Regulatory Associates, Inc., as agent for Prime Source, LLC, respectfully submits the enclosed final print label as required by the EPA letter dated September 27th, 2018. In support of this request, enclosed are the following documents:

- Letter from Prime Source, LLC appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Notification (8570-1)
- Copy of the final market label

If you have any questions about this submission, please contact the undersigned at (302) 753-5305 or ktwoodall@wagnerreg.com.

Respectfully submitted,

Katie Woodall

Agent for Prime Source, LLC

August 29, 2019

Document Processing Desk (NOTIF)
ATTN: Catherine Aubee, PM 10
Registration Division (7505P)
U.S. Environmental Protection Agency
Office of Pesticide Programs
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202



Re: Bifen 7.9SC Select; ABN: Bifen 7.9F Select; ABN: Lawn Pest Killer - EPA Reg. No. 89442-23 CSF Notification

Dear Ms. Aubee,

Wagner Regulatory Associates, Inc., as agent for Prime Source, LLC, respectfully submits the enclosed notification to:

- 1. Add additional sources of technical and additional producers as Alternate CSFs #5-7,
- 2. And update the sequence of numbering for Alternate CSFs #8-9 (previously approved as Alternate CSFs #9-10, June 24, 2019) for the above referenced product.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

In support of this request, the following documents are being submitted electronically via the EPA CDX PSP portal:

- Letter from Prime Source, LLC, appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Notification (8570-1)
- Confidential Statement of Formulas –Alternates #5-9
- Formulators Exemption (8570-27)

Please feel free to contact me via email at keeva@wagnerreg.com or telephone at (302) 635-7281.

Respectfully submitted,

Keeva Shultz

Agent for Prime Source, LLC

August 29, 2019

Document Processing Desk (AMEND) ATTN: Catherine Aubee, PM 10 Registration Division (7505P) U.S. Environmental Protection Agency Office of Pesticide Programs One Potomac Yard 2777 South Crystal Drive Arlington, Virginia 22202



Re: Bifen 7.9SC Select; ABN: Bifen 7.9F Select; ABN: Lawn Pest Killer - EPA Reg. No. 89442-23 CSF Amendment

Dear Ms. Aubee,

Wagner Regulatory Associates, Inc., as agent for Prime Source, LLC, respectfully submits the enclosed amendment to add a new formulation as Alternate #10 CSF to the above reference product. All inert ingredients have been approved by the EPA Inert division.

In support of this request, the following documents are being submitted electronically via the EPA CDX PSP portal:

- Letter from Prime Source, LLC, appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Amendment (8570-1)
- Confidential Statement of Formulas –Alternate #10
- Formulators Exemption (8570-27)

Please feel free to contact me via email at keeva@wagnerreg.com or telephone at (302) 635-7281.

Respectfully submitted,

Keeva Shultz

Agent for Prime Source, LLC

July 24th, 2019

Document Processing Desk (NOTIF) Attn: Jacquelyn Herrick, PM 3 Registration Division U.S. Environmental Protection Agency Office of Pesticide Programs (7505P) Room S-4900, One Potomac Yard 2777 South Crystal Drive Arlington, Virginia 22202-4501



Subject: Bifen 7.9SC Select – EPA Reg. No. 89442-23

Label Notification

Dear Ms. Herrick,

Wagner Regulatory Associates, Inc., as agent for Prime Source, LLC (EPA Co. 89442), is submitting a label notification to add a descriptor to the first page and correct minor typographical errors.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

In support of this request, the following documents are being submitted electronically via the EPA CDX PSP portal:

- Letter from Prime Source, LLC appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Notification (8570-1)
- Copy of the label highlighted and clean version

Thank you in advance for your efforts in reviewing this submission. Please do not hesitate to contact me by email at ktwoodall@wagnerreg.com or by phone at 302-753-5305 should you have any questions.

Respectfully submitted,

Katie Woodall

Agent for Prime Source, LLC

June 24, 2019

Document Processing Desk (NOTIF)
ATTN: Anna Briley, PM 10
Registration Division (7505P)
U.S. Environmental Protection Agency
Office of Pesticide Programs
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202



Re: Bifen 7.9SC Select; ABN: Bifen 7.9F Select; ABN: Lawn Pest Killer - EPA Reg. No. 89442-23 CSF Notification

Dear Ms. Briley,

Wagner Regulatory Associates, Inc., as agent for Prime Source, LLC, respectfully submits the enclosed notification to update the source of technical with the new EPA Reg. No. in Alt. #1 & #4 CSF and add an additional source of technical as Alt. #9 & #10 for the above referenced product. This submission will supersede the submission made on Oct. 11, 2018 to add Alt. #4 CSF and the submission made on Jan. 28, 2019 to add producers to Alt. #1 CSF. All changes and pervious changes made on these CSFs have been highlighted.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

In support of this request, the following documents are being submitted electronically via the EPA CDX PSP portal:

- Letter from Prime Source, LLC, appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Notification (8570-1)
- Confidential Statement of Formulas –Alternates #1, 4, 9-10
- Formulators Exemption (8570-27)

Please feel free to contact me via email at keeva@wagnerreg.com or telephone at (302) 635-7281.

Respectfully submitted,

Keeva Shultz

Agent for Prime Source, LLC

April 1st, 2019

Document Processing Desk (NOTIF) ATTN: Richard Gebken (PM 10) Registration Division (7504P) U.S. Environmental Protection Agency One Potomac Yard 2777 South Crystal Drive Arlington, Virginia 22202

Re: Bifen 7.9SC Select

ABN: Bifen 7.9F Select ABN: Lawn Pest Killer

EPA Registration No. 89442-23 Final Print Label Submission

Dear Mr. Gebken,

Wagner Regulatory Associates, Inc., as agent for Prime Source, LLC, respectfully submits the enclosed final print label as required by the EPA letter dated September 27th, 2018. In support of this request, enclosed are the following documents:

- Letter from Prime Source, LLC appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Notification (8570-1)
- Copy of the final market label

If you have any questions about this submission, please contact the undersigned at (302) 753-5305 or ktwoodall@wagnerreg.com.

Respectfully submitted,

Katie Woodall

Agent for Prime Source, LLC



January 28, 2019

Document Processing Desk (NOTIF)
ATTN: Richard Gebken, PM 10
Registration Division (7505P)
U.S. Environmental Protection Agency
Office of Pesticide Programs
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202



Dear Mr. Gebken,

Re: Bifen 7.9SC Select; ABN: Bifen 7.9F Select; ABN: Lawn Pest Killer - EPA Reg. No. 89442-23 CSF Notification

Wagner Regulatory Associates, Inc., as agent for Prime Source, LLC, respectfully submits the enclosed notification adding additional producers to the basic and alternates 1-3 Confidential Statements of Formulas for the above referenced product.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

In support of this request, the following documents are being submitted electronically via the EPA CDX PSP portal:

- Letter from Prime Source, LLC, appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Notification (8570-1)
- Confidential Statement of Formulas Basic & Alternates #1 3
- Formulators Exemption (8570-27)

Please feel free to contact me via email at keeva@wagnerreg.com or telephone at (302) 635-7281.

Respectfully submitted,

Keeva Shultz

Agent for Prime Source, LLC

October 11, 2018

Document Processing Desk (NOTIF)
ATTN: Richard Gebken, PM 10
Registration Division (7505P)
U.S. Environmental Protection Agency
Office of Pesticide Programs
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202



Dear Mr. Gebken,

Re: Bifen 7.9SC Select; ABN: Bifen 7.9F Select; ABN: Lawn Pest Killer - EPA Reg. No. 89442-23 CSF Notification

Wagner Regulatory Associates, Inc., as agent for Prime Source, LLC, respectfully submits the enclosed notification to add sources of technical and additional producers through the addition of Alternate Confidential Statements of Formulas 4-8 for the above referenced product.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

In support of this request, the following documents are being submitted electronically via the EPA CDX PSP portal:

- Letter from Prime Source, LLC, appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Notification (8570-1)
- Confidential Statement of Formulas –Alternates #4-8
- Formulators Exemption (8570-27)

Please feel free to contact me via email at keeva@wagnerreg.com or telephone at (302) 635-7281.

Respectfully submitted,

Kleva Shulty Keeva Shultz

Agent for Prime Source, LLC

September 14, 2018

Document Processing Desk (NOTIF) ATTN: Richard Gebken (PM 10) Registration Division (7504P) U.S. Environmental Protection Agency One Potomac Yard 2777 South Crystal Drive Arlington, Virginia 22202

Re: Bifen 7.9SC Select

ABN: Bifen 7.9F Select ABN: Lawn Pest Killer

EPA Registration No. 89442-23 Final Print Label Submission

Dear Mr. Gebken,

Wagner Regulatory Associates, Inc., as agent for Prime Source, LLC, respectfully submits the enclosed final print label as required by the EPA letter dated May 11, 2018. In support of this request, enclosed are the following documents:

- Letter from Prime Source, LLC appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Notification (8570-1)
- Copy of the final market label

If you have any questions about this submission, please contact the undersigned at (302) 635-7279 or barbarette@wagnerreg.com.

Respectfully submitted,

Barbarette Young-Henry

Agent for Prime Source, LLC

August 9, 2018

Document Processing Desk (NOTIF) ATTN: Richard Gebken (PM 10) Registration Division (7505P) U.S. Environmental Protection Agency Office of Pesticide Programs One Potomac Yard 2777 South Crystal Drive Arlington, Virginia 22202



Re: Bifen 7.9SC Select ABN: Bifen 7.9F Select; ABN: Lawn Past Killer, EPA Registration No. 89442-23 Notification of an additional Alternate Brand Name

Dear Mr. Gebken,

Wagner Regulatory Associates, Inc., as agent for Prime Source, LLC, respectfully submits the enclosed label notification to add the additional Alternate Brand Name – **Ike's Farm, Home, Garden Lawn Pest Killer**. In support of this submission, the following documents are being submitted via the CDX Portal:

- Letter from Prime Source, LLC appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Notification (8570-1)
- Formulators Exemption Statement (8570-27)
- A copy of the label Clean & Highlighted

Please feel free to contact me via email at ktwoodall@wagnerreg.com or telephone at (302) 753-5305.

Respectfully submitted,

Katie Woodall

Agent for Prime Source, LLC

June 25, 2018

Document Processing Desk (NOTIF) ATTN: Richard Gebken (PM 10) Registration Division (7505P) U.S. Environmental Protection Agency Office of Pesticide Programs One Potomac Yard 2777 South Crystal Drive Arlington, Virginia 22202 Wagner Regulatory Associates, Inc. P.O. Box 640 7217 Lancaster Pike, Suite A Hockessin, Delaware 19707

Re: Bifen 7.9SC Select

ABN: Bifen 7.9F Select ABN: Lawn Pest Killer FPA Registration No. 894

EPA Registration No. 89442-23 Final Print Label Submission

Dear Mr. Gebken,

Wagner Regulatory Associates, Inc., as agent for Prime Source, LLC, respectfully submits the enclosed final print label as required by the EPA letter dated May 11, 2018. In support of this request, enclosed are the following documents:

- Letter from Prime Source, LLC appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Notification (8570-1)
- Copy of the final market label

If you have any questions about this submission, please contact the undersigned at (302) 635-7279 or barbarette@wagnerreg.com.

Respectfully submitted,

Barbarette Young-Henry

Agent for Prime Source, LLC

March 15th, 2018

Document Processing Desk (NOTIF) ATTN: Richard Gebken (PM 10) Registration Division (7505P) U.S. Environmental Protection Agency Office of Pesticide Programs One Potomac Yard 2777 South Crystal Drive Arlington, Virginia 22202



Re: Bifen 7.9SC Select ABN: Bifen 7.9F Select, EPA Registration No. 89442-23 Notification of an additional Alternate Brand Name

Dear Mr. Gebken,

Wagner Regulatory Associates, Inc., as agent for Prime Source, LLC, respectfully submits the enclosed label notification to correct minor typographical errors and to add the additional Alternate Brand Name – Lawn Pest Killer. In support of this submission, the following documents are being submitted via the CDX Portal:

- Letter from Prime Source, LLC appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Notification (8570-1)
- Formulators Exemption Statement (8570-27)
- A copy of the label Clean & Highlighted

Please feel free to contact me via email at ktwoodall@wagnerreg.com or telephone at (302) 753-5305.

Respectfully submitted,

Katie Woodall

Agent for Prime Source, LLC

March 8, 2018

Document Processing Desk (NOTIF)
ATTN: Richard Gebken, PM 10
Registration Division (7505P)
U.S. Environmental Protection Agency
Office of Pesticide Programs
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202



Dear Mr. Gebken,

Re: Bifen 7.9SC Select; ABN: Bifen 7.9F Select - EPA Reg. No. 89442-23 Adding Additional Producers – CSF Notification

Wagner Regulatory Associates, Inc., as agent for Prime Source, LLC, respectfully submits the enclosed notification adding additional producers to the basic and alternates 1-3 Confidential Statements of Formulas for the above referenced product.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

In support of this request, the following documents are being submitted electronically via the EPA CDX PSP portal:

- Letter from Prime Source, LLC, appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Notification (8570-1)
- Confidential Statement of Formulas Basic & Alternates #1 3
- Formulators Exemption (8570-27)

Please feel free to contact me via email at <u>keeva@wagnerreg.com</u> or telephone at (302) 635-7281.

Respectfully submitted,

Keeva Shultz

Agent for Prime Source, LLC

December 1, 2017

Document Processing Desk (NOTIF) ATTN: Elizabeth Fertich (PM 3) Registration Division (7505P) U.S. Environmental Protection Agency Office of Pesticide Programs One Potomac Yard 2777 South Crystal Drive Arlington, Virginia 22202



Dear Ms. Fertich,

Re: Bifen 7.9SC Select; ABN: Bifen 7.9F Select - EPA Reg. No. 89442-23 Adding Additional Producers – CSF Notification

Wagner Regulatory Associates, Inc., as agent for Prime Source, LLC, respectfully submits the enclosed notification adding additional producers to the basic and alternates 1-3 Confidential Statements of Formulas for the above referenced product.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

In support of this request, the following documents are being submitted electronically via the EPA CDX PSP portal:

- Letter from Prime Source, LLC, appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Notification (8570-1)
- Confidential Statement of Formulas Basic & Alternates #1 3
- Formulators Exemption (8570-27)

Please feel free to contact me via email at <u>keeva@wagnerreg.com</u> or telephone at (302) 635-7281.

Respectfully submitted,

Kelva Shultz

Agent for Prime Source, LLC

Product ingredient source information may be entitled to confidential treatment

Submitted Electronically

January 25, 2017

Document Processing Desk (NOTIF)
ATTN: Kable Bo Davis (PM 3)
Registration Division (7505P)
U.S. Environmental Protection Agency
Office of Pesticide Programs
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202



Dear Mr. Davis,

Re: Bifen 7.9SC Select; ABN: Bifen 7.9F Select - EPA Reg. No. 89442-23 Adding Additional Producer - CSF Notification

Wagner Regulatory Associates, Inc., as agent for Prime Source LLC, respectfully submits the enclosed notification to add an additional producer to the Confidential Statement of Formulas for the subject product.

Therefore, the company name, address, & EPA Reg. No. for this active has been updated to reflect the transferred product information. The enclosed Confidential Statement of Formulas will replace all previously approved CSFs. In support of this submission, the following documents are attached:

- · Letter from Prime Source LLC, appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Notification (8570-1)
- Confidential Statement of Formulas Basic & Alternates #1 3
- Formulators Exemption (8570-27)
- NPIRS confirmation of Registration Transfer -

Please feel free to contact me via email at ktwoodall@wagnerreg.com or telephone at (302) 635-7289.

Respectfully submitted,

Kt Woodall

Agent for Prime Source LLC

Submitted Electronically via EPA CDX

October 19th, 2016

Document Processing Desk (NOTIF) ATTN: Kable Bo Davis (PM 3) Registration Division (7505P) U.S. Environmental Protection Agency Office of Pesticide Programs One Potomac Yard 2777 South Crystal Drive Arlington, Virginia 22202



Dear Mr. Davis,

Re: Bifen 7.9SC Select ABN: Bifen 7.9F Select, EPA Reg. No. 89442-23 Additional Source of TGAI - Notification

Wagner Regulatory Associates, Inc., as agent for Prime Source LLC, respectfully submits the enclosed notification to add an alternate (#3) Confidential Statement of Formula for the subject product. This notification includes an additional source of TGAI. No other changes have been made to the formulation. Enclosed for the Agency's review are the following:

In support of this request, the following documents and studies are attached:

- Letter from Prime Source LLC, appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Notification (8570-1)
- Confidential Statement of Formula Alternate #3
- Formulators Exemption (8570-27)

Please feel free to contact me via email at ktwoodall@wagnerreg.com or telephone at (302) 635-7289.

Respectfully submitted,

Kt Woodall

Agent for Prime Source LLC



September 23, 2016

Document Processing Desk
ATTN: Kable Bo Davis (PM 3)
Registration Division (7505P)
U.S. Environmental Protection Agency
Office of Pesticide Programs
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202

Re: Bifen 7.9SC Select, EPA Reg. No. 89442-23 - Final Print

Dear Mr. Davis,

Wagner Regulatory Associates, Inc. respectfully submits the enclosed final print label for the subject product in response to the EPA letter dated August 19, 2015 along with an updated address.

If you have any questions about this submission, please contact the undersigned at (302) 635-7289 or kari.albright@wagnerreg.com.

Respectfully submitted,

Kari Albright

Agent for Prime Source LLC



Document Processing Desk (NOTIF) ATTN: Kable Bo Davis (PM 3) Registration Division (7505P) U.S. Environmental Protection Agency Office of Pesticide Programs One Potomac Yard 2777 South Crystal Drive Arlington, Virginia 22202

Re: Bifen 7.9SC Select ABN: Bifen 7.9F Select, EPA Reg. No. 89442-23 Notification of Revised Confidential Statement of Formulas

Dear Mr. Davis:

Wagner Regulatory Associates, Inc., as agent for Prime Source LLC, respectfully notifies the Agency that an additional production facility has been added to Box 2 of the Basic, Alternate 1, and Alternate 2 Confidential Statement of Formulas. These revised CSFs will replace all current EPA approved CSFs dated June 10th, 2015.

In support of this request, the following documents and studies are attached:

- Letter from Prime Source LLC, appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Registration (8570-1)
- Revised CSFs

Please feel free to contact me via email at cheryl@wagnerreg.com or telephone at (302) 635-7289.

Respectfully submitted,

Cheryl Wagner

Agent for Prime Source LLC

Change & Wagne

June 10th, 2016



Document Processing Desk (NOTIF)
ATTN: Kable Bo Davis (PM 3)
Registration Division (7505P)
U.S. Environmental Protection Agency
Office of Pesticide Programs
One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202

Re: Bifen 7.9SC Select ABN: Bifen 7.9F Select, EPA Reg. No. 89442-23 Notification of Revised Confidential Statement of Formulas

Dear Mr. Davis:

Wagner Regulatory Associates, Inc., as agent for Prime Source LLC, respectfully notifies the Agency that an additional production facility has been added to Box 2 of the Basic, Alternate 1, and Alternate 2 Confidential Statement of Formulas. These revised CSFs will replace all current EPA approved CSFs dated June 10th, 2015.

In support of this request, the following documents and studies are attached:

- Letter from Prime Source LLC, appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Registration (8570-1)
- Revised CSFs

Please feel free to contact me via email at cheryl@wagnerreg.com or telephone at (302) 635-7289.

Respectfully submitted,

Cheryl Wagner

Agent for Prime Source LLC

Charge & Wagner



December 9, 2020

To: Whom it May Concern

Re: Prime Source, LLC EPA# 89442 - Letter of Authorization

This letter serves as notification that Prime Source, LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding State and/or Federal regulatory matters as determined by Prime Source, LLC. The following employees of Wagner Regulatory Associates, Inc. are authorized to act on our behalf:

James Wagner

Email: james(a) wagnerreg.com

Phone: 302-635-7290

Carrie Nolan

Email: carrie(a) wagnerreg.com

Phone: 302-635-7632

Keeva Shultz

Email: keeva@wagnerreg.com

Phone: 302-635-7281

Julie Kozlowski

Email: julie@wagnerreg.com

Phone: 302-635-7279

Catherine Parmeter

Email: catherine@wagnerreg.com

Phone: 410-920-8756

S. K. Theodorakis

Email: tim.t@wagnerreg.com

Phone: 302-510-0039

Katie Woodall

Email: ktwoodall@wagnerreg.com

Phone: 302-753-5305

Rachel Hardie

Email: rachel@wagnerreg.com

Phone: 302-635-7289

Ogongi Ogongi

Email: ogongi@wagnerreg.com

Phone: 302-239-7369

Annette Marine

Email: annette.marine@wagnerreg.com

Phone: 302-635-7283

Correspondence can be addressed to any of the above employees at:

Wagner Regulatory Associates, Inc.

P.O. Box 640

7217 Lancaster Pike, Suite A Hockessin, DE 19707-0640

Thank you for your time and assistance. Please feel free to contact Wagner Regulatory Associates, Inc. should you have any questions.

Respectfully submitted,

Paul Conover

Regulatory and Quality Assurance Manager



October 27, 2020

To: Whom it May Concern

Re: Prime Source, LLC EPA# 89442 - Letter of Authorization

This letter serves as notification that Prime Source, LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding State and/or Federal regulatory matters as determined by Prime Source, LLC. The following employees of Wagner Regulatory Associates, Inc. are authorized to act on our behalf:

James Wagner

Email: james(a) wagnerreg.com

Phone: 302-635-7290

Carrie Nolan

Email: carrie(a) wagnerreg.com

Phone: 302-635-7632

Keeva Shultz

Email: keeva@wagnerreg.com

Phone: 302-635-7281

Julie Kozlowski

Email: julie@wagnerreg.com

Phone: 302-635-7279

Catherine Parmeter

Email: catherine@wagnerreg.com

Phone: 410-920-8756

S. K. Theodorakis

Email: tim.t@wagnerreg.com

Phone: 302-510-0039

Katie Woodall

Email: ktwoodall@wagnerreg.com

Phone: 302-753-5305

Rachel Hardie

Email: rachel@wagnerreg.com

Phone: 302-635-7289

Ogongi Ogongi

Email: ogongi@wagnerreg.com

Phone: 302-239-7369

Correspondence can be addressed to any of the above employees at:

Wagner Regulatory Associates, Inc.

P.O. Box 640

7217 Lancaster Pike, Suite A Hockessin, DE 19707-0640

Thank you for your time and assistance. Please feel free to contact Wagner Regulatory Associates, Inc. should you have any questions.

Respectfully submitted,

Paul Conover

Regulatory and Quality Assurance Manager



November 30, 2018

To: Whom it May Concern

Re: Prime Source, LLC 89442

This letter serves as notification that Prime Source, LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding state and/or federal regulatory matters as determined by Prime Source. The following employees of Wagner Regulatory Associates, Inc. are authorized to act on our behalf:

James Wagner Anna Armstrong

Email: james@wagnerreg.com Email: anna@wagnerreg.com

Phone: 302-635-7290 Phone: 302-510-0039

Julie Kozlowski Katie Woodall

Email: julie@wagnerreg.com Email: ktwoodall@wagnerreg.com

Phone: 302-635-7279 Phone: 302-753-5305

Carrie Nolan Rachel Hardie

Email: carrie@wagnerreg.com Email: rachel@wagnerreg.com

Phone: 302-635-7632 Phone: 302-635-7289

Keeva Shultz Laura Phelps

Email: kceva@wagnerreg.com Email: laura@wagnerreg.com

Phone: 302-635-7281 Phone: 919-353-2439

Correspondence can be addressed to any of the above employees at:

Wagner Regulatory Associates P. O. Box 640

Hockessin, DE 19707-0640

Thank you for your time and assistance. Please feel free to contact Wagner Regulatory Associates should you have any questions.

Respectfully submitted,

Prime Source, LLC - Chief Operating Officer

January 7, 2016

To: Whom it May Concern

Re: Prime Source LLC

This letter serves as notification that Prime Source LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding state and/or federal regulatory matters as determined by Prime Source LLC. The following employees of Wagner Regulatory Associates, Inc. are authorized to act on our behalf:

James Wagner Cheryl Wagner

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Email: <u>carrie@wagnerreg.com</u> Email: <u>barbarette@wagnerreg.com</u>

Phone: 302-635-7632 Phone: 302-635-7279

Kt Woodall

Email: ktwoodall@wagnerreg.com

Phone: 302-635-7281

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Wagner Regulatory Associates

P. O. Box 640

Hockessin, DE 19707-0640

Thank you for your time and assistance. Please feel free to contact Wagner Regulatory Associates should you have any questions.

Respectfully submitted,

William A. Fassnacht Prime Source LLC Chief Operating Officer



September 19, 2019

To: Whom it May Concern

Re: Prime Source, LLC EPA# 89442 - Letter of Authorization

This letter serves as notification that Prime Source, LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding State and/or Federal regulatory matters as determined by Prime Source, LLC. The following employees of Wagner Regulatory Associates, Inc. are authorized to act on our behalf:

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P.O. Box 640

7217 Lancaster Pike, Suite A

Hockessin, DE 19707-0640

Thank you for your time and assistance. Please feel free to contact Wagner Regulatory Associates, Inc. should you have any questions.

Respectfully submitted,

Paul Conover

Regulatory and Quality Assurance Manager



November 30, 2018

To: Whom it May Concern

Re: Prime Source, LLC 89442

This letter serves as notification that Prime Source, LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding state and/or federal regulatory matters as determined by Prime Source. The following employees of Wagner Regulatory Associates, Inc. are authorized to act on our behalf:

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Phone: 302-635-7281 Phone: 919-353-2439

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Hockessin, DE 19707-0640

Thank you for your time and assistance. Please feel free to contact Wagner Regulatory Associates should you have any questions.

Respectfully submitted,

Prime Source, LLC - Chief Operating Officer



September 28, 2016

To: Whom it May Concern

Re: Prime Source, LLC 89442

This letter serves as notification that Prime Source, LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding state and/or federal regulatory matters as determined by Prime Source. The following employees of Wagner Regulatory Associates, Inc. are authorized to act on our behalf:

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Hockessin, DE 19707-0640

Thank you for your time and assistance. Please feel free to contact Wagner Regulatory Associates should you have any questions.

Respectfully submitted,

Prime Source, LLC - Chief Operating Officer

January 7, 2016

To: Whom it May Concern

Re: Prime Source LLC

This letter serves as notification that Prime Source LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding state and/or federal regulatory matters as determined by Prime Source LLC. The following employees of Wagner Regulatory Associates, Inc. are authorized to act on our behalf:

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Wagner Regulatory Associates

P. O. Box 640

Hockessin, DE 19707-0640

Thank you for your time and assistance. Please feel free to contact Wagner Regulatory Associates should you have any questions.

Respectfully submitted,

William A. Fassnacht Prime Source LLC Chief Operating Officer



September 28, 2016

To: Whom it May Concern

Re: Prime Source, LLC 89442

This letter serves as notification that Prime Source, LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding state and/or federal regulatory matters as determined by Prime Source. The following employees of Wagner Regulatory Associates, Inc. are authorized to act on our behalf:

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Thank you for your time and assistance. Please feel free to contact Wagner Regulatory Associates should you have any questions.

Respectfully submitted,

Prime Source, LLC - Chief Operating Officer